Chapter Six

Communications and Outreach

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I. Introduction

The Communications and Outreach Work Group (COWG) was created in the early stages of the EDSTAC process because it was recognized that effective communication about the endocrine disruptor screening and testing program and its results, as well as about the EDSTAC process itself, would be critical to the success of the Committees efforts. The COWG was charged with three principal tasks:

1. providing advice on the coordination of the overall communications and outreach efforts surrounding the EDSTAC process;

a)

2. developing recommendations to be incorporated into the EDSTAC final report on communication issues regarding key decision points of the Conceptual Framework and implementation of the Endocrine Disruptor Screening and Testing Program (EDSTP); and

a)

3. improving the understandability of the final report and any other materials distributed by the Committee.

A significant portion of the work completed by the COWG during the EDSTAC process fell under the first task-coordination and input on overall communications and outreach efforts surrounding the EDSTAC plenary meetings. Activities of the work group included: providing feedback to EPA on the public comment period session; developing the *Description of the EDSTAC Charge*; recommending to EPA that the Agency coordinate an outreach mailing to interested and potentially interested parties and then assisting in the assembly of materials for the mailing; and discussing additional outreach efforts for EPA and the Committee. Incorporated in the EPA outreach mailing was a questionnaire developed by the COWG and disseminated to over 1,500 addressees. This questionnaire was created in an effort to obtain information as to the public's interest in the EDSTAC and its activities during the Committee's tenure, as well as to help in future outreach efforts by the Agency. The information received in response to this questionnaire will assist the Agency in determining the most effective way(s) to communicate with those individuals and organizations interested in the EDSTAC process. A summary of the results of the survey can be found in Appendix Q.

The recommendations found in this chapter focus primarily on the second of these three tasks. In some instances, however, it was more fitting to include communication recommendations regarding key decisions of the Conceptual Framework and the EDSTP elsewhere in the report.

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The work group's efforts surrounding the third task above included: review of the PSWG and STWG chapters to ensure communication issues are addressed where appropriate; development of language appropriate for distribution to the public describing various aspects of the screening and testing program; and development of background materials describing the basic science of the endocrine system, as well as an overview of the science of endocrine disruption for use in the introductory chapter of this Report.

II. Need for Communication

The EDSTAC Conceptual Framework, which has been described elsewhere in this document, is premised on a phased or tiered approach to decision-making regarding potential endocrine-disruptors. Under this approach, increasingly more specific and definitive information is used to reach key decisions, which eventually lead to judgments about whether a chemical or mixture does or does not have endocrine-disrupting properties for the hormonal systems currently addressed by the program (i.e., estrogen, androgen, and thyroid systems).

The first steps of the program utilize broad criteria relating to exposure- and effects-related information for the purposes of sorting and prioritizing chemicals for Tier 1 Screening (T1S). Criteria for moving a chemical into screening are less restrictive than criteria used later in the program to move chemicals from screening into testing or, similarly, from testing into hazard assessment. The purpose of using less restrictive criteria initially is to ensure that chemicals ~~with endocrine disrupting potential~~that may have endocrine activity are not missed in early steps of the program, when information less specific for evaluating endocrine-disrupting properties is used to make decisions. Thus, because the information gathered regarding potential endocrine activity and endocrine-disrupting properties becomes more specific as a chemical moves through the EDSTP, the criteria for progressing through the program need to be more restrictive as well.

When little or no effects data on a chemical is available, additional information to guide sorting and priority setting decision-making will come from the results of High Throughput Pre-Screening (HTPS), as described in Chapter Four. ~~This information is intended to be sufficiently broad so as to help ensure that any positive activity is likely to trigger a higher priority.~~ T1S is intended to ~~test and~~ identify through screening assays, those chemicals that may have potential endocrine ~~disrupting properties~~activity and, if so, to forward those compounds to the next step of the program, Tier 2 Testing (T2T). T2T is intended to provide more definitive data for determining whether a particular compound does or does not ~~have~~ produce adverse effects ~~on the endocrine system~~ that are endocrine related and of sufficient concern to require a hazard assessment.

The most significant points where communication is needed occur where decisions are made to move chemicals forward in the EDSTP. The tiered approach is constructed so the Agency will have considerable certainty that a chemical does not possess endocrine-disrupting properties for estrogen, androgen, or thyroid-related effects when a decision is made NOT to move forward. On the other hand, the tiered approach still carries a level of uncertainty as to whether chemicals that are moved into screening and testing will ultimately be found to possess endocrine-disrupting properties. Thus, it is important for EPA to clearly communicate the limitations that must be placed on the interpretation of information from the EDSTP, as well as the meaning and implication of its decisions, particularly during early phases of the program.

One significant concern identified by the Committee is that information could be misused to label chemicals as "endocrine-disruptors" prior to there being evidence to support such a claim. Such potential misuse of information could lead to unnecessary and undue anxiety, which, in the end, could create problems serving the interest of no one. This, therefore, necessitates that the public and other interested stakeholders be provided with accurate information about the meaning of the EDSTP results. The recommendations found in the remainder of this chapter seek to emphasize the importance of communication as EPA moves forward with implementation of the EDSTP.

III. Recommendations

A. Principles to Guide Implementation of a Communications and Outreach Strategy

EPA should develop and implement an effective communications and outreach strategy for the Endocrine Disruptor Screening and Testing Program (EDSTP), an element vital to the program's success. EPA should follow a set of principles regarding implementation of the communications and outreach strategy, which include:

- Both the process and results of the EDSTP should be open and transparent;

x

- The results of the EDSTP should be interpreted and communicated within the context set forth in the EDSTAC final report;

x

- The limitations and uncertainties of the available data and the results of EDSTP should be articulated clearly when the screening and testing program is discussed;

x

- As new scientific evidence emerges, the uncertainties and limitations of the data may also change. These changes should be communicated clearly; and

- EPA should develop quality assurance processes to assure that any database maintained for the public relative to the EDSTP is accurate and current.

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B. Basic Features of the Communications and Outreach Strategy

[NOTE TO THE READER: The text that follows in incomplete, as it was necessary for the COWG to wait until the structure of the EDSTP was in place before finalizing recommendations on what should be communicated about the Program. This section will be included in the next version of the document.]

The EDSTP will quickly produce an abundance of information, some of which may be controversial and sensitive to some interests. As results of the program are generated, it will be imperative for EPA to make them available to the public in a timely manner and to provide guidance on their interpretation.

This program of communication and outreach should consider the following four issues:

1. What should be communicated?
2. To whom should information be communicated?
3. How should information be communicated?
4. When should information be communicated?

1. What Should be Communicated?

The EDSTAC has focused on several aspects of the program, described below, about which EPA should be prepared to provide information. Where appropriate, the Committee has provided suggested language that could be used to communicate such information to those interested in the issues and the outcomes of the EDSTP.

a) Description of the Endocrine Disruptor Screening and Testing Program

When EDSTP decisions result in the creation of a list of chemicals, EPA should be prepared to address questions such as the following:

- What does this list mean?
- For what purpose will the list be used?
- What are the chemicals on the list?
- How was this list derived?
- Who compiled the list?

- Are there other ways to get a chemical on the list or considered for inclusion?
- How can a chemical be removed from the list?

During priority setting, chemicals are grouped into one of three categories, as described below. As chemicals pass through the EDSTP, descriptions of these categorizations should be utilized to explain the status of a substance within the EDSTP for the public or other interested party. The categories following priority setting are:

[TEXT TO BE INSERTED LATER.]

Following Tier 1 Screening, the categories are:

[TEXT TO BE INSERTED LATER.]

Following Tier 2 Testing, the categories are:

[TEXT TO BE INSERTED LATER.]

It is recognized that any chemical or mixture that has been deferred or held can be actively recalled into EDSTP screening based on:

- the emergence of new information on the endocrine-disrupting potential of the chemical;
- the development of new screens and tests that may yield useful data;
- new statutory requirements that mandate review; or
- existing statutes that require periodic review.

b) Screening and Testing Results

Regular EDSTP status reports should be produced and distributed. These documents should include:

- the status of all chemicals and mixtures within the EDSTP;
- a list of all chemicals and mixtures whose status within the EDSTP has changed since the last update; and
- important EDSTP decisions and developments at definitive points in the program, such as calls for nominations of compounds to be considered in priority setting; lists of chemicals that have been prioritized for T1S; lists of chemicals that have been identified for T2T; lists of chemicals that have been identified as having endocrine-disrupting properties in T2T and are now subject to hazard assessment; significant scientific advances in the field; the incorporation of new assays into the EDSTP; and expansion of the scope of work (e.g., looking at additional hormones).

c) Nominations Process

As described in Chapter Four, of this Report, the EDSTAC recommends EPA establish a process that would allow affected citizens to nominate chemical substances or mixtures (CSMs) for endocrine disruptor screening and testing. In general, the nominations process is intended to focus on CSMs where exposures are disproportionately experienced by identifiable groups, communities, or ecosystems rather than CSMs where exposures are more broadly experienced by the general population at the regional and/or national levels. The process should provide a mechanism for prioritizing CSMs unlikely to be considered as high priority through the "core" priority setting process.

It is important for EPA to alert the public about the opportunity to nominate chemicals, as well as to provide accurate and up-to-date information about the status of all chemicals considered for prioritization. Members of the public should be encouraged to provide comment during the formal Public Comment Period, which is expected to take place after EPA has publicized its proposed list of prioritized CSMs. An opportunity to nominate chemicals will occur at the start of each phase of the EDSTP. Please refer to Chapter Four, Section XI for more information on the nominations process.

d) Background Information on the EDSTAC Process

EPA should communicate information to the public about the EDSTAC, including its purpose, goals, and process as needed. The language contained in Section X of the Introduction chapter of this Report could be used by the Agency for this purpose.

2. To Whom Should Information be Communicated?

a) Members of the Public and Other Stakeholders

Throughout the EDSTAC process, an interest in the issue of endocrine disruption and the development of a screening and testing program was evident. This was demonstrated via the public comment sessions held at each plenary meeting, where members of the public representing industry, environmental groups, advocacy organizations, farmers and farm workers, governmental organizations, environmental and health non-governmental organizations (NGOs), trade unions, disease-impacted groups, environmental justice networks, students, affected or "downstream" industries, and concerned citizens, among others, were given the opportunity to present their comments to the Committee regarding the deliberations of the EDSTAC and its work groups. A compilation of the statements made by members of the public at each of the EDSTAC meetings can be found in Appendix R. Furthermore, each of these stakeholders was also represented either in one of the work groups or on the Committee itself, further demonstrating the variety of interests contributing to this effort.

It is recommended that EPA proactively communicate with groups, such as those listed above, which have clearly demonstrated an interest in the issue, particularly those organizations and individuals who have requested to receive program information directly from EPA. The database of names and organizations already collected by the EDSTAC could be used as a base of contacts for proactive communication to stakeholders. In fact, much of the data entry has already been done. Other stakeholders to include can be found in the list of organizations that received EPA's September 1997 mailing, as well as The Keystone Center's list of interested parties accumulated over the life of the EDSTAC process.

b) Specific Audiences

For some stakeholders, EPA will find it necessary to go beyond the generic EDSTP status reports. A tailored set of messages about the program targeted to specific audiences will be needed. It is clear the "public" consists of numerous types of people and organizations, each with varying levels of knowledge and interest in endocrine disruptor-related issues. In addition, many communities face other challenges such as language barriers and differences in culture or economic viability. Such differences create a need for informational materials to be tailored to such audiences. In particular, EPA should consider this type of communication with environmental justice organizations, downstream industries, farm workers, and patient-specific groups. To find out more about communicating with such constituencies, the Committee recommends EPA conduct a follow-up survey, building on the information gathered from the September 1997 survey described in Section I of this chapter.

3. How Should Information be Communicated?

As EPA carries the important new responsibility of screening and testing chemical substances and mixtures for endocrine disruption, it will be necessary to develop a capacity to quickly respond to requests for information, both about specific chemicals and about the screening and testing program in general.

a) Electronic Communication

[Note to the reader: Between the March and June plenary meetings, the COWG will be in contact with EPA staff to explore the possibility of incorporating the EDSTP tracking database with one that is currently operating within EPA.]

The centerpiece of this component should be an electronic Web site, which is accessible by the public. It should be possible for anyone to query and quickly determine the status of a chemical or mixture in the EDSTP, as well as to access and download relevant EDSTP documents. To reduce costs and minimize duplicative efforts, EPA should seek to incorporate such a tracking system into an existing EPA database.

The availability of a tracking system will be a particularly important tool as it relates to the nominations program. Members of the public should be able to rely on this database to provide timely and accurate information about chemicals that have been prioritized for T1S, either through the nominations process or other means. The availability of such information will be imperative as affected communities, in particular, review the list to determine if chemicals of concern to them have been selected for T1S.

b) Telephone, Fax, Mail, and Other Communication

For those who do not have access to the Internet, the contents of the EDSTP Web site should be available by other media through EPA staff support. A centralized, automated telephone system should be developed. In addition, regular EDSTP status reports and important program developments should be posted in: the Federal Register; pesticide registration notices; press releases; and Web announcements. In addition, where appropriate, EPA should provide information about the screening and testing program through a variety of media, such as general fact sheets, question-and-answer documents, information booklets, EPA newsletters, brochures, pamphlets, trade journals, videotapes, slide presentations, and other publications as appropriate.

EPA should initiate contact with stakeholders, providing them with the address of the Web site and the number of the centralized telephone site. The Agency should maintain proactive communication with these groups until they indicate they plan to receive information electronically or are no longer interested.

To be successful, EPA should invest resources into how to effectively manage professional communication efforts.

4. When Should Information be Communicated?

Communication should occur regularly and frequently given the rapid developments in the science of endocrine disruption and the increasing public interest in the issue. There are two kinds of information that EPA should be prepared to communicate.

a) Quarterly EDSTP Status Reports

The COWG discussed the means and mechanisms available for disseminating information to the public regarding the progress and results of the screening and testing program. One option EPA has used in other programs is a quarterly bulletin or newsletter that identifies specific actions, events, and program directions taken by EPA staff. The Committee recommends EPA explore this option for disseminating information to members of the public for whom e-mail is either not available or is not an effective means of receiving such information.

The committee recognizes that this type of informing effort needs to be goal oriented and have some specific parameters in order to provide that best use of Agency funds. Therefore, the following operating conditions should be taken into account in creating and updating bulletin:

- The output would be in the form of newsletter or bulletin for public consumption with the purpose of informing the public of the program and its progress;
- The publication would be of a limited length (16 pages?) and in a desk top format;
- Publication would start shortly after EPA initiated the program in late 1998 or mid-1999, and continue for a defined period of time;
- The publication should be produced for the duration of the screening phase and into the testing phase, or four to five years, with some predetermined ending time;
- The content of the publication could be chemical-specific, but more likely would direct interested readers to where detailed information could be found, rather than list volumes of detailed scientific technical information; and
- The publication should draw heavily on the Web site information, if not duplicate much of what is on the Web site.

The survey conducted by EPA with advice from the COWG indicated that there are members of the public, including individual citizens, organizations, and small businesses, for whom electronic access is not an effective mode of communicating, or is not available. For these constituents, EPA should provide information in an accessible and easy to understand form.

b) Whenever Important EDSTP Developments Warrant Communication

Important developments in the EDSTP of a definitive, non-preliminary nature should be communicated as soon as that information is available, rather than waiting for the generation of regular quarterly status reports. Examples might include calls for nominations of compounds, at the outset of each phase of the EDSTP, that are to be considered in priority setting; lists of chemicals that have been prioritized for T1S; lists of chemicals that have identified for T2T; lists of chemicals that have been identified as having endocrine-disrupting properties in T2T and are subject to hazard assessment; significant scientific advances in the field; the incorporation of new assays into the EDSTP; expansion of the scope of work (looking at additional hormones, for example); and other key decisions or developments within the EDSTP program.

C. Adequacy of Resources Devoted to Communication and Outreach

Management of the EDSTP will be a significant new responsibility for EPA, and providing public information on the program will be essential for the full cooperation of affected and interested parties. EPA should allocate sufficient resources with high-level responsibility to manage its communications and outreach strategy.

It is important that all information be available through a small number of centralized sites. It is vital that the public and other interested parties be able to obtain information through a central site rather than having to track the material to a specific office in the Agency.

The work group identified the following tasks that must be provided resources on a continuing basis:

- Creation and maintenance of a centralized tracking system in the form of a database, which may be queried for the status of particular chemicals and for summaries of status across classes of compounds.
- Creation and maintenance of a component of a Web site with an appropriate graphical user interface (GUI) allowing individuals to make these inquiries.
- Creation and maintenance of a component of the same Web site allowing individuals to obtain background documents and regular EDSTP status reports.
- Creation and maintenance of a centralized, automated telephone system allowing individuals to access the tracking system database and to order specific program documents.
- Assignment of staff to monitor the four items above, and to disseminate materials that either are requested through the automated telephone system or other ways. In addition, this staff resource should proactively send regular EDSTP status reports, as well as important program updates, to stakeholders who have requested such.

Management of the EDSTP should continue to be the responsibility of the EPA Assistant Administrator of the Office of Prevention, Pesticides, and Toxic Substances. Concurrently, coordination across the entire Agency should enable all EPA staff to locate and supply requested information.