

**A RESOURCE GUIDE ON
PREPARING FOR HPV
CHEMICAL COMMUNICATIONS**

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THE ALLIANCE FOR CHEMICAL AWARENESS

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While the ACA believes that the approaches represented here are sound, it is clearly understood that this guidance will not be necessary or even appropriate in certain circumstances. Ultimately, the approach to communicating HPV information will be up to the sole discretion of individual sponsors, and will depend on the sponsor's judgment about the needs of specific audiences to understand the potential hazards of and exposures to a given chemical.

Table of Contents

Executive Summary and Guiding Principles

I. HPV Chemical Evaluation Programs

- The U.S. HPV Challenge Program
 - The ACA Position
 - Genesis of the U.S. HPV Challenge
 - The Framework Agreement
 - The Internet Tracking System
 - Industry Consortia
 - Status of the U.S. HPV Challenge
- The OECD SIDS Program
- The ICCA HPV Initiative

II. Milestones and Timelines for the HPV Program

- Introduction
- U.S. HPV Data Reporting
- U.S. HPV Chemical Communications Planning Timeline
- ICCA and OECD SIDS Data Reporting and Communications Planning

III. Preparing Your Organization for HPV Inquiries

- Introduction
- Who Will Communicate Your HPV Chemical Information?
- Being Prepared for HPV Chemical Results
 - Have a Team in Place
 - Find Out and Speak Out
 - Remember the Long Term
- General Principles for Chemical Communication
- Summary

IV. Developing the Basis of a Communications Program for HPV Chemicals

- The Generic Communications Planning Process Outline
 - Analyze the situation, and define possible outcomes
 - Focus on defining success for each of the possible outcomes
 - Focus on who the key audiences are for each possible outcome and consolidate the list of audiences into primary and secondary
 - Determine the issues of each audience under each possible outcome
 - Identify any glaring gaps in the process so far
 - Develop responsive messages to address each of the issues previously identified
 - Determine the proper channels for communicating each message
 - Implement and measure success

V. Integrating the Communications Planning into HPV Reporting Efforts

Introduction

Considering Audience Needs in HPV Report Development

Technical Audiences

Non-Technical Audiences

Dos and Don'ts For HPV Communication

VI. Additional Internet-Based Resources

Executive Summary and Guiding Principles

This document has been prepared for use by sponsors in the HPV chemical testing program to assist them in communicating the results of work on HPV chemicals. It contains background information on the various programs which are driving the development of data on HPV chemicals, and can be used to help respond to inquiries a sponsor may receive about that program. Additional resources contained herein include: information on the schedule of the HPV chemical testing programs; suggestions on how to prepare organizationally for the release of HPV data; some general communications strategies that may prove useful in developing an HPV communications program; and, links to other related communications resources that may be helpful in this regard.

While the ACA does not endorse or specify a particular style of approach to the communication of HPV data, and recognizes that such decisions are for individual sponsors to make, the following “generic” chemical risk communication themes are embodied in this document:

Accept and Involve the Public as a Partner - People have a right to participate in decisions that affect their lives. The goal of risk communication should not be to defuse public concerns or avoid action, but rather to produce a meaningfully informed public that is involved, interested, reasonable, thoughtful, solution-oriented and collaborative.

Plan Carefully and Evaluate Performance - Different goals, audiences and media require different risk communication strategies. Begin with clear, explicit objectives – such as providing information to the media or the scientific community – and put in place ways to measure the effectiveness of your communications.

Listen to your Audience - Remember that communication is a two-way activity. If you want people to listen to you, listen to them.

Be Honest, Frank and Open - In communicating risk information, trust and credibility are your most precious assets. Trust and credibility take time to obtain, and if lost, are almost impossible to regain.

Coordinate and Collaborate with Other Credible Sources - Allies can help you communicate risk information more effectively. Try to issue communications jointly with other trustworthy sources, such as credible university scientists and physicians.

Meet the Needs of the Media - The media will most often be the prime transmitters of information to the public. As a result, they play a key role in setting agendas and in determining outcomes. Be open and accessible to reporters, and try to establish long-term relationships of trust with them and their editors.

Speak Clearly and with Compassion - Technical language and jargon can be barriers to successful communication with the public. Use simple, non-technical language.

I. HPV Chemical Evaluation Programs

The U.S. HPV Challenge Program

Members of the Alliance for Chemical Awareness (ACA) and other industry groups, the U.S. Environmental Protection Agency (EPA) and Environmental Defense (ED) have agreed on a plan to increase the amount of publicly available screening-level hazard information on U.S. high production volume (HPV) chemicals. HPV chemicals are those manufactured or imported into the U.S. in quantities exceeding a million pounds per year. Data availability and adequacy reviews have already been initiated for many chemicals covered by this initiative, and existing studies are being summarized. The goal is for companies to make initial hazard data sets (based on a standard, OECD recommended list) publicly available on the majority of 2,800 HPV chemicals by 2004. Total cost of the program is estimated to approach \$500 million.

ACA's Position

ACA welcomes the high level of cooperation between all parties to produce an effective voluntary program that will provide EPA and the public with an unprecedented amount of information on the potential health and environmental effects of HPV chemicals. The voluntary HPV program is a significant improvement over traditional "command-and-control" regulatory approaches. However, the current program focuses exclusively on the hazards of chemicals. The next important step will be to continue the cooperative approach to ensure risk-based decision-making, particularly through developing and communicating chemical use and exposure information. This additional information would help put hazard information from the HPV Chemical Challenge program into an appropriate risk context. As product stewards, sponsors are encouraged to provide this risk context for the HPV chemicals, and to make this information available to all interested parties.

The Genesis of the U.S. HPV Challenge

In mid-1997, ED, then the Environmental Defense Fund (EDF), released a report suggesting there was a lack of publicly available hazard screening data for a sample list of U.S. HPV chemicals. Subsequent studies by EPA and the American Chemistry Council (ACC), then the Chemical Manufacturers Association (CMA), found similar results. Using criteria established by the 29-nation Organization for Economic Cooperation and Development (OECD) for a "screening level" hazard assessment, both EPA and ACC found that complete hazard screening data sets were not publicly available for a majority of U.S. HPV chemicals. In April 1998, Vice President Al Gore unveiled a "Chemical Right to Know" initiative that included a challenge to increase HPV chemical hazard data generation. That initiative called on industry to complete SIDS-level hazard assessments on all of the 2,800 U.S. HPV chemicals within three years, or face mandatory testing under Toxic Substances Control Act (TSCA) "test rules".

The Framework Agreement

Shortly after release of the ED data availability study, and continuing after the Vice President's April 1998 challenge, industry met with ED and others to develop agreement around an alternative voluntary approach to the HPV Challenge. The agreement, referred to as the "framework," was announced in October 1998. Among other things, the agreement:

1. Allows six years (until 2004) to complete hazard data generation, rather than three.
2. Permits evaluation of certain chemicals by "category" approaches, rather than testing every individual chemical.
3. Establishes an Internet-based tracking system to enable the public, media, regulators, the scientific community and others to monitor progress of the HPV Challenge.
4. Provides that chemicals not volunteered by companies or consortia may be subject to mandatory assessment under TSCA test rules.
5. Stipulates that results of all existing data and new testing be made public.

The Internet Tracking System

The Internet-based tracking system is a critical part of the HPV initiative. The tracking system was designed to provide companies and consortia with a single, Internet-based means of recording commitments.

The system also provides a window for the public, including the media, to track individual company and overall industry progress under the HPV challenge program. Individual companies and consortia that agree to participate in the program identify themselves and the chemicals that they have volunteered. They also select a "start year" during which work will begin, with a goal of completing work within 18 months. Notices will be posted if progress against these timetables slips 60 days beyond a scheduled milestone. The public has access to all of the information put into the tracking system - as well as access to the EPA site on which "robust summaries" of results will be posted.

The Internet address for the tracking system is <http://www.hpvchallenge.com>.

Industry Consortia

Most HPV chemicals are made by more than one company. As a part of the effort to encourage chemical companies to participate in the HPV Challenge, chemical producers have worked with each other, and with their respective trade associations to form consortia - to provide an efficient, easy way for manufacturers and importers of the same chemicals to share existing information, conduct joint assessments, and generate new data, when needed.

Many of the HPV consortia are represented in the ACA, either via trade associations, or individual member companies. As a result, ACA participants have access to the wide array of administrative and technical services offered through ACA member organizations.

Status of the U.S. HPV Challenge

At this writing, 469 companies and 147 consortia have signed up to assess 2,155 chemicals. EPA, industry and environmental groups all have stated that they are pleased with the program's success. EPA has recently published a proposed TSCA test rule, to ensure that data are available on chemicals not addressed voluntarily.

The OECD SIDS Program

More than a decade ago, a cooperative international program to conduct hazard assessments on globally produced HPV chemicals was established by OECD. Countries participating in that program created a list of more than 4,000 “global” HPV chemicals, and agreed on a process for generating hazard level screening data, and conducting initial hazard assessments on those chemicals. That process and the required tests are referred to as the “SIDS” (Screening Information Data Sets) program. The EPA has been a key participant in the SIDS program, and has cooperated with industry and environmentalists in providing data and initial hazard assessments.

As the SIDS program was initially conceived, governments would select chemicals and draft the assessments, then bring the draft assessment to technical meetings of government regulatory authorities for joint review and decision making. Unfortunately, progress during the first several years of the global program was slow, with hazard assessments completed on only a few hundred chemicals. Recently however, the SIDS program has been “refocused” and the pace of assessments has been greatly increased to accommodate the voluntary contributions from industry, including hazard screening data generated under the U.S. HPV Challenge program, as well as hazard assessments provided under the “ICCA HPV Initiative” (described below).

The ICCA HPV Initiative:

During the period that the framework for the U.S. HPV Challenge program was being discussed and the OECD SIDS program was being refocused, other chemical testing and policy initiatives were being proposed in Europe and other parts of the world. In order to avoid wasting resources and effort in redundant and potentially conflicting initiatives, the global chemical industry proposed an integrated initiative that incorporates the common elements from the disparate activities. Under the auspices of the International Council of Chemical Associations (ICCA), industry created the ICCA HPV Initiative – with a goal of providing OECD with SIDS-level data and completed initial hazard assessments on 1,000 global HPV chemicals by 2004. The chemicals selected are HPV in two of the three principle

regions (North America, Europe and Japan), or are HPV in one region, and of special regulatory interest in another. The process for chemical selection has been completely transparent, and (similar to the U.S. Challenge program) an internet-based tracking system has been established to allow governments and the public to monitor progress against commitments. This system can be accessed at <http://www.ICCAHPV.com>.

Under the ICCA Initiative, industry data from the U.S. HPV Challenge program can be used to support OECD hazard assessments, and EPA has agreed to accept commitments to “ICCA chemicals” as the equivalent of volunteering for the U.S. HPV Challenge program. OECD has agreed, on a pilot basis, to accept industry-drafted assessments, but the conclusions from the assessment process will remain with governments. Thus, the programs are mutually supportive, and will ultimately save significant government and industry resources.

II. Milestones and Timelines for the HPV Programs

Introduction

In order to understand where and how the elements of a communications effort for HPV chemicals will play out, it is first necessary to understand the background of the HPV testing programs, and the “calendar of events” that will surround the assessment, potential testing, and reporting on each HPV chemical.

U.S. HPV Data Reporting

When individual companies, consortia or associations registered their commitments to the US HPV Challenge program, they were required to select from one of four different “start years” in which any new testing needed would begin. As a result, each HPV chemical or category is expected to proceed through the program according to a schedule that is tied to its specific start year. The specific start years for volunteered HPV chemicals/categories can be found at : <http://www.hpvchallenge.com/reports/ChemicalSearch.asp?Type=HPV>

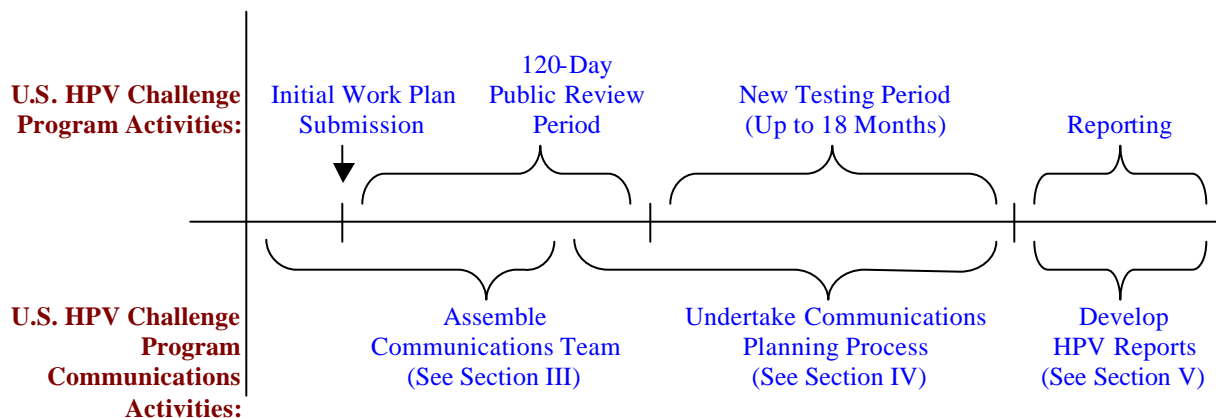
The Challenge program also requires companies and consortia to prepare “work plans”, which involve assembling and assessing the adequacy of existing data, and identifying data gaps that will need to be filled with new tests. Once the “work plan” is posted, there is a 120-day review period for the public and EPA to make comments. Following that, there is an expectation that sponsors will attempt to complete the testing and submit the study summaries of new data within 18 months.

This process is shown in the table on the next page. It is against this timeline that the ACA has developed this communications document.

Timeframe	Related Actions
April 98 – December 99	<ul style="list-style-type: none"> • Volunteer; Form consortia (as appropriate) • Register commitment
Start Year: 2000, 2001, 2002, 2003	<ul style="list-style-type: none"> • Assemble and assess existing data • Identify data gaps and prepare work plan • Submit summaries of existing data and work plans for comment
120-Day Review	<ul style="list-style-type: none"> • EPA and stakeholders provide comments
Additional Testing (up to 18 months)	<ul style="list-style-type: none"> • Update plans based on feedback, where appropriate • Develop new data
Completion	<ul style="list-style-type: none"> • Submit final reports • Assess need for further work

U.S. HPV Chemical Communications Planning Timeline

So that sponsors can be prepared for their HPV communications efforts, the following generic communications timeline shows the various stages of activity in the assessment of a U.S. HPV chemical, and the associated recommended communications activities. Note that the assembly of a communications team can actually precede the submission of the Initial Work Plan. The communications activities that are identified in this timeline are described in latter sections of this document.



ICCA and OECD SIDS Data Reporting and Communications Planning

The time frame for data reporting under these initiatives is roughly similar, but not identical to the U.S. HPV Challenge. Because the ICCA and OECD initiatives involve the further step of bringing the data summaries together into one new initial hazard assessment document, it is expected that the time frame for completing the work and making information available will be slightly longer. The important point to remember is that the U.S. HPV Challenge program will result in robust summaries of hazard studies, but the ICCA and OECD programs will result in those same robust summaries *plus* one single document which assesses the hazards, some elements of exposure, as well as a recommendation on whether further work is needed (known as a SIDS Initial Assessment Report, or SIAR).

Predicting exactly when data and initial hazard assessments from the ICCA and/or OECD programs will become publicly available also is less certain than under the U.S. HPV Challenge. Traditionally, OECD did not make the hazard data and assessments publicly available until *after* the SIAR had been reviewed and approved by all OECD members at a SIDS Initial Assessment Meeting (SIAM). Previously SIAMs were held once every nine months, with only a dozen or so chemicals completing review at a meeting. This meant that there was a lag – years sometimes – from submission of data to public availability. Improvements currently in process at the OECD should address that problem: SIAMs will be held more frequently, and more chemicals will be considered at each SIAM. Most significantly, many sponsor countries (including the U.S.) are working independently with the ICCA sponsors to find ways to make at least some information publicly available as soon as industry submits it to the sponsor government.

Therefore, as a general rule, companies sponsoring chemicals under the ICCA and OECD programs should consider completing the “Communications Planning Process” (see Section IV, below) by the time the SIAR is first submitted to the OECD sponsor country.

III. Preparing Your Organization for HPV Inquiries

Introduction

If your company, either alone or through a consortium, has volunteered chemicals under either the U.S. HPV Chemical Challenge or the ICCA initiative, you should expect and be prepared for questions from the public. But, before you get those questions, you should have put into place a plan to communicate information about your HPV chemicals.

The questions, when they come, may be from neighbors in the communities where the chemical is produced, workers at the producing plant, a customer's business, the media, public interest groups, or consumers. Using the approaches outlined in this document can help you to prepare information that will enable you to answer those questions.

The good news is that your company, or members of your consortia probably have already been preparing and practicing risk communication, especially with plant communities, since the Emergency Planning and Right to Know Act, Title III of Superfund was passed in 1986. As a result, the job your organization now faces in communicating with the public on the results of HPV chemical testing can often be built on those systems that are in place, with adaptations to recognize that inquiries on HPV may go well beyond a plant community.

Who Will Communicate Your HPV Chemical Information?

There are a number of target audiences for communication about HPV chemicals (see Developing the Basis of a Communications Program for HPV Chemicals in this document). As a company or a consortium, you need to decide who within your organization will be used as sources of information for your chemicals. Some possible "communicators" are communications managers, toxicologists, plant managers, company health and medical personnel and management. In order to have a dialogue with the audiences interested in your HPV chemical hazard, exposure or use information, the exchange of information should be two-way. That is, you shouldn't just disseminate information, but rather be available to discuss current findings, and any plans for additional work.

As your organization is gathering existing data and preparing a work plan, it also should be putting together the team that will be responsible for developing the HPV chemical communications. That team might, for example, contain members from the company's communications, legal and occupational or regulatory health or toxicology departments. Actual spokespersons who will interact with external audiences should probably be chosen from a limited number of knowledgeable persons who, if possible, have undergone media training.

Once your organization has made the decision that communicating on HPV chemicals to the public is important, don't forget about internal communication. While the HPV risk communication team is responsible for creating a dialogue with the audiences you have prioritized as important, every employee of your organization should be exposed to the communications messages that you are using, and understand what they mean.

Being Prepared for HPV Chemical Results

Corporations that deal with chemicals on a daily basis already undertake considerable precautions to ensure that their products are formulated, transported, distributed and used safely. Yet it is possible, even for chemicals that have been closely studied, that previously unidentified hazard or exposure data may come to light as a consequence of the HPV program, or that the public may have unanticipated questions. Thus, every organization, including HPV sponsors, should be prepared for these possibilities.

Much has been written over the past few years, in both the popular and business media, about preparing for the release of chemical information. In the case of HPV testing and evaluation, such information could take the form of toxicity testing results that were not anticipated, or the identification of potentially significant chemical use and exposure information that was not previously known, or well characterized.

The following message points do not attempt to re-create all of the specific strategies that have been laid out in great detail elsewhere, but instead try to list a few reminders of what past experience suggests is useful to help prepare for the advent of new information.

Have A Team In Place

- As noted in the previous section, forming a stand-by team and having a "preparedness manual" in place may help deal with the arrival of HPV data. As a part of this effort, make sure that key players are identified and assembled and on-board ahead of time.
- Consider having members of the sponsoring organization media trained.
- Make sure that there are communications tools (phone, fax, email, Internet) in place to communicate immediately with "primary audiences:"

Manufacturers and distributors
Retail/Trade customers
Local community groups near plant sites
U.S. Regulatory Agencies
Household consumers

- Test out the communications system. Develop scenarios and check to see where gaps may exist.
- Have non-technical summaries prepared on the uses and risks of the HPV chemicals of interest. Hazardous substances facts sheets developed by the State of New Jersey, which can be accessed at <http://www.state.nj.us/health/eoh/rtkweb/rtkhsfs.htm>, provide examples of such summaries. Most reporters will have limited familiarity with most HPV chemicals. Therefore, a prepared fact sheet to accompany any news release – as well as background information on the sponsoring organization - helps convey to the media and the public the organization’s understanding of the situation. (See ACA’s related document on preparing reports for non-technical audiences.)

Find Out and Speak Out

- Get as much substantiated information about the nature of the HPV results as quickly as possible, and make sure that the communications team is informed about all of the latest developments.
- Provide interested members of the media with the spokesperson’s contact information, so that they can be reached on short notice.
- Identify “opinion leaders”, such as members of the media and community activist organizations who are likely to have more interest in the HPV information than the “average” citizen. Consider preparing a non-technical report with a medium level of detail and follow-up contact information available for these audiences.
- Be prepared to answer media calls as quickly as possible, once a response has been formulated. Make sure that all statements are as forthcoming as possible. If there is not much information to share, be sure to convey that your company or consortium is trying to learn more about the issue, and will be forthcoming, once it is understood.
- Make sure that messages are consistent, from CEO to assembly line. Make sure key spokespeople are credible, understandable, and not on the defensive.
- Follow a communications plan, and ensure that all relevant audiences are being contacted.
- Make sure that any Web site and consumer affairs people (the folks who answer the phones) have updated information.
- Be prepared to address the question: “Why should we (the audience) find your (sponsor’s) data or analyses to be acceptable?”

Remember the Long Term

A communications strategy can't just be short-term. How the release of HPV data is dealt with could affect the organization's reputation for some time to come – positively or negatively. Take the steps necessary to demonstrate credibility and respect for both sponsoring organization and the audience in all public communications during all HPV reporting efforts.

General Principles for Chemical Communication

After you have decided who will be responsible for providing and explaining information about your chemical – the public spokesperson -- he or she should become familiar with and use the guidelines and rules for chemical communication. These rules have been developed over the years for chemical and other companies as they prepared to communicate “worst-case scenario” information as required by Section 112(r) of the Clean Air Act.

Those who have studied and debated risk generally agree on seven “cardinal” rules for risk communication. These rules were published in a 1988 American Chemistry Council manual for plant managers titled “Risk Communication, Risk Statistics, and Risk Comparisons.” The manual was prepared for the Council, then called the Chemical Manufacturers Association, by Vincent T. Covello, Ph.D., Peter M. Sandman, Ph.D., and Paul Slovic, Ph.D. The Seven Cardinal Rules of Risk Communication were based on work done by Covello and F. Allen. An additional background resources on chemical risk communication are listed in Section VI of this document.

Here, in a modified format, are some of the general rules, as they apply to HPV chemical risk communication.

Rule 1. Accept and Involve the Public as a Partner.

- Two basic tenets of risk communication are generally accepted and understood: First, people have a right to participate in decisions that affect their lives. Second, the goal of risk communication should not be to diffuse public concerns or avoid action, but rather to produce an informed public that is involved, interested, reasonable, thoughtful, solution-oriented and collaborative.

Rule 2. Plan Carefully and Evaluate Performance.

- Different goals, audiences and media require different risk communication strategies. After you've determined your key audiences, start with the primary ones and determine the issues of each audience under each possible outcome for your HPV chemical hazard assessment. Begin with clear, explicit objectives – such as providing information to the media or the scientific community, and what you want to motivate

them to do. It is also useful to put in place systems that will measure the effectiveness of your actions.

Rule 3. Listen to your Audience.

- People in your audiences may well be more concerned about issues such as trust and credibility than the details of the screening-level assessment. Remember that communication is a two-way activity. If you want people to listen to you, listen to them.

Rule 4. Be Honest, Frank and Open.

- In communicating risk information, trust and credibility are your most precious assets. Trust and credibility take time to obtain, and if lost, are almost impossible to regain..

Rule 5. Coordinate and Collaborate with Other Credible Sources.

- Allies can help you communicate risk information more effectively. Try to issue communications jointly with other trustworthy sources such as credible university scientists and physicians.

Rule 6. Meet the Needs of the Media.

- The media will most often be the prime transmitters of information to the public. As a result, they play a key role in setting agendas and in determining outcomes. You should be open and accessible to reporters and try to establish long-term relationships of trust with them and their editors.

Rule 7. Speak Clearly and with Compassion.

- Technical language and jargon are useful when talking with your counterparts involved in the HPV Chemical Challenge. But, they are barriers to successful communication with the public. Use simple, non-technical language.

Summary

Preparing your organization for HPV chemical inquiries can be a sizeable task. But, most of the classical communications techniques that have been developed for sharing information within and outside of an organization can be used. Perhaps nowhere else will the fundamental communications attributes of clarity, openness, and honesty be as important as in this arena. By making organizational preparedness a deliberate aspect of the communications planning process, sponsoring companies and consortia will have the best chance for their results to be understood and properly interpreted.

IV. Developing the Basis of a Communications Program for HPV Chemicals

The Generic Communications Planning Process Outline:

Irrespective of the issue for which a communications program is needed, there are certain basic steps that have been shown to be effective when developing such a program. The following basic steps form the foundations of any communications planning process.

- Analyze the situation, and define possible outcomes
- Focus on defining success for each of the possible outcomes
- Focus on who the key audiences are for each possible outcome, and consolidate the list of audiences into primary and secondary
- Determine the issues of each audience under each possible outcome
- Identify any glaring gaps in the process so far
- Develop responsive messages to address each of the issues previously identified
- Determine the proper channels for communicating each message
- Implement the process and measure success

Application of these approaches is intended to assist sponsoring organizations in the development of their own HPV communications plan. It is important to recognize that any such communication effort will need to be “customized” to meet the needs of the individual sponsoring company or testing consortia, in light of the results obtained from their screening-level characterizations.

Analyze the situation, and define possible outcomes

In cases where companies provide the public with hazard data as well as an initial screening-level assessment (e.g., under the OECD and/or ICCA programs), there are essentially three possible results. The first is a conclusion that the screening level assessment is supported by sufficient data, and the data indicate that the chemical is a low priority for further action, at this time. However, sponsors should periodically review the assessment to determine if there have been any new or additional data related to the chemical. This would include items such as new potential routes of exposure, or new hazard information on the chemical. The second possible outcome from the screening level assessment could be an indication that the chemical currently needs

further evaluation. This could include the need to gather additional information about the uses of the chemical in commerce, and the attendant potential for exposure to it; the need for more precise “higher-tier” hazard or exposure evaluation. The third possible outcome from the screening level assessment could be a need for risk management. This will normally mean that the sponsor may recommend changes to some aspect of how the chemical is handled or used, in order to decrease exposures. Additional detail on all of these possible outcomes is contained in the ACA’s technical exposure framework document.

Focus on defining success for each of the possible outcomes

The specific definition of success for a given member company will, of course, necessarily be determined in the context of the particular situation and chemical that is being evaluated. However, there are certain general reactions that can be anticipated under the three possible outcomes described above that can be used to generally define what “success” looks like. In the development of the communications plans for the individual HPV chemicals, sponsoring companies and consortia are encouraged to consider different possible definitions of success. To illustrate, some examples are suggested below.

Communications Success in Outcome #1 (HPV Chemical is a Low Priority for Work at this Time)

- Technical audiences understand the analysis that was conducted to reach the conclusion
- All audiences concur with the findings and conclusions
- Products containing the HPV chemical are viewed as safe and acceptable
- All audiences understand what will be involved in the follow-up monitoring for new uses or exposures

Communications Success in Outcome #2 (HPV Chemical Needs Further Evaluation)

- All audiences recognize that this is only a screening assessment using conservative assumptions, and do not take the current set of information out of context
- Technical audiences understand the analysis that was conducted to reach the conclusion
- All audiences understand what the screening assessment is, and what it isn’t
- No one prematurely judges whether or not a particular chemical application is acceptable
- All audiences understand what the follow-up will entail, the sponsor’s commitment to pursuing the additional activities, and their timing
- All audiences feel that the sponsors are acting responsibly to understand the situation

All audiences know where to turn for subsequent information on the chemical as it becomes available

Communications Success in Outcome #3 (HPV Chemical may be a Candidate for Risk Management Action)

Technical audiences understand the analysis that was conducted to reach the conclusion

All audiences understand the rationale for the conclusion

All audiences feel that the sponsors are acting responsibly

Focus on who the key audiences are for each possible outcome, and consolidate the audiences into primary and secondary

Defining the audiences is one of the single most important elements in the development of a successful communications plan. In the case of the HPV chemical screening-level characterization communication, there will likely be a wide variety of audiences to whom a given sponsoring company or testing consortia will want to communicate the results of the screening. But, there are certain potential audiences that can be anticipated, regardless of the chemical in question, based purely on past interest in this issue, and the stake that they have in the outcome of the HPV chemical program. These are likely to include:

- Media
- Manufacturers and distributors
- User manufacturers/processors
- Retail/trade customers
- Small/medium chemical processors
- Household consumers
- Environmental and health organizations
- U.S. regulatory agencies
- U.S. Congress/White House
- Scientific community (academia and think tanks)
- Consumer advocacy groups
- Local community groups near plant sites
- Downstream users
- International government agencies
- Labor organizations

Each of these audiences can be classified as either a “primary” or “secondary” audience for the purpose of allocating resources to the communications effort. A “primary audience” here is an audience that *could be materially affected* by health or ecological consequences of a particular chemical, or *who have direct influence* over the companies associated with the chemical. This may include, for example, manufacturers and distributors, local community groups near plant sites, household consumers, U.S. regulatory agencies, and retail/trade customers. A “secondary” audience is one which

may be *indirectly affected by the chemical*, or those that may be *influential on a primary audience*. This may include groups such as environmental and health organizations, the media, labor organizations, and members of the scientific community.

These audiences also can be categorized into “technical” and “non-technical”, based on the likely amount of technical detail that they will want to receive on the HPV chemical screening-level characterizations. The non-technical audiences can be further subdivided into those individuals who actively seek out chemical information (and can serve as “opinion leaders”), and members of the “general public”. Proper characterization of the target audiences will have a bearing on the structure of the communication, and will be discussed in subsequent sections.

Determine the issues of each audience under each possible outcome

When one speaks of identifying the issues for the various audiences, the real intent here is to try to preemptively anticipate the issues and questions that a given audience will have, to facilitate effective communication on the issue. With this as a backdrop, sponsors may want to attempt to identify the major issues that could be raised by the various audiences under each of the three possible program outcomes. While it may not be possible to anticipate all of the issues that can be raised, it can be beneficial to highlight the major issues that could arise.

Ultimately, each sponsoring organization that undertakes an HPV communication will need to consider the issues of the particular audiences interested in their assessments, and be prepared to respond accordingly.

Identify any glaring gaps in the process so far

Having gone through the initial four tasks of the communications planning process, sponsoring organizations should then take a step back from the situation, and try to identify any glaring gaps in the process. This can often be facilitated by having another person or persons review the work completed to date to see if it appears to meet the overarching goals of the process.

The following questions may be considered: Have all the right audiences been initially identified? Does the identification of an issue for a particular audience suggest the need for additional audiences to be considered? Are there possible outcomes that are secondary to the communication itself that need to be anticipated in the process? Will the process be open, honest and equitable to all of the stakeholders involved?

Once a thorough self-examination of the results of the first four steps of the communications planning process have been completed, the next task of developing responsive messages can proceed.

Develop responsive messages to address each of the issues previously identified

The primary objective for the HPV chemical characterization communications process is to provide interested parties with an understandable and credible assessment of the potential risks associated with the use of particular HPV chemicals in commerce, not to provide a “sales pitch”. With this goal in mind, the next step in the communications planning process deals with the development of responsive messages.

The exercise of message development will largely be driven from the issues that were identified for each primary audience in a previous step. For each major issue that might otherwise impede the audience’s understanding of the HPV chemical screening-level characterization, there should be a corresponding message that addresses the issue in some fashion. For example, if a particular audience expresses concern that not every single potential route of exposure was considered, then it is important to include as a message an acknowledgement of the limitations of the methodology in the reporting, along with an explanation as to why certain uses were investigated, but not others.

Basic responsive messages to address most of the “generic” concerns/issues identified for the various primary audiences should be prepared. Perhaps more importantly, one must bear in mind that the communications efforts for a specific HPV chemical will need to include messages that are responsive to the particular issues for the individual chemical under consideration.

Determine the proper channels for communicating each message

Having developed responsive messages that can be used to help audiences understand the nature, results, and limitations of a given HPV chemical screening-level characterization, one must then consider the proper channels for communicating this information to the target audiences. Where possible, sponsors should build on relationships that may already exist with the target audiences.

In determining the proper channels for communicating the results of the HPV chemical screening-level evaluations, it is important consider a wide variety of communications tools to reach a diverse set of audiences. Also, sponsors need to consider whether the specific communications will include an active outreach process, or more passive forms of communications, such as informational web sites and stand-by reports. Often, the decision on which approach to employ will depend on the target audience involved, with active outreach more appropriately targeted at opinion leaders, such as the media and community activist organizations.

The following are some channels that can be considered for this communication effort.

Establish a company/consortia web site that will contain the results of the screening-level characterizations, with links to other relevant sites.

Establish and maintain ongoing relationships with trade media who would cover issues related to the particular HPV chemical of interest.

Identify partners (e.g. third-party experts with recognized credibility) who can be used to help deliver the message to selected audiences.

Engage regulatory agencies with authority over HPV issues, and provide them with a level of data analysis and reporting that meets their needs.

Develop fact sheets and key message statements that can be used to communicate to a “general public” non-technical audience.

Ensure that the organization has a designated spokesperson who will act as a point of continuity and information release on matters related to the specific HPV chemical.

Encourage employees of the sponsoring company or consortium to act as ambassadors within the organization to get accurate information disseminated about the HPV chemical.

Implement and measure success

The final step in the continuing communication process for HPV chemicals involves executing the plans that have been put into place, and then evaluating their effectiveness. Every communication effort benefits from having some form of listening and feedback mechanism built into it. Items such as questionnaires, informal interviews with key audience representatives, and electronic feedback mechanisms on the web site are some possible avenues for gathering information about the success of the communications effort. Armed with this information, adjustments can then be made in subsequent communications efforts.

V. Integrating the Communications Planning into HPV Reporting Efforts

Introduction

Up to this point, the communications planning discussion for HPV has focused on understanding the audiences, issues, messages and channels for HPV communication. It has been a largely theoretical planning exercise. The challenge then lies in taking this information and dovetailing it with the work sponsors do to characterize their HPV chemicals, and to present these results in a tangible, understandable product.

The U.S. HPV Challenge program is a voluntary program, and therefore is not constrained by specific regulatory reporting requirements. The only “required” elements are robust summaries of the SIDS-level hazard screening data. However, there is nothing to prohibit sponsors from developing and/or providing any other manner of information on the chemical, such as uses, potential exposures, benefits or risks.

Under both the SIDS program and the ICCA Initiative, there is guidance that deals with the information to be included in the SIDS Initial Assessment Report (SIAR). However, that document provides only the minimum information about how the chemical is used, and does not prescribe inclusion of use, exposure or other information necessary to place HPV hazard data into a meaningful risk context. As a result, (especially if the hazards of the chemical are considered to be low) some sponsors may choose to provide only the minimum required exposure information; others may decide to conduct a comprehensive analysis. The vehicle for providing the various audiences this type of context for HPV testing data will likely include written reports that will exist either as hard copy, or in electronically-accessible formats.

The main objective of the communications program for HPV chemical screening-level assessments is to provide the various audiences with objective, understandable interpretations of the results of the HPV testing and characterization initiatives in a form that meets their particular needs and interests. As such, any reporting of HPV chemical testing or data or its interpretation must be specific to the audience needs, and must recognize both the strengths and the limitations of the processes by which they were developed.

Considering Audience Needs in HPV Report Development

In light of the above objective, it is first necessary to consider the various audiences to which HPV chemical screening-level characterizations may be provided. In reviewing the previous chapter’s discussion on potential audiences for the HPV chemical screening-level characterizations, there are essentially two types of audiences that need to be considered in this exercise – a series of technical audiences, and non-technical audiences. However, even

within these two discrete audiences, there will be variation in the level of detail that any given person will seek. For that reason, it is suggested that HPV reporting be constructed in a series of “layers”, where the initial layer provides an easily digestible summary of the results and limitations of the assessment, with subsequent layers of reporting providing successively greater levels of detail and documentation.

When developing the HPV chemical screening-level characterization reports, it is important to structure these documents in a way that facilitates any given individual’s understanding of the information at the level he/she desires it.

Technical Audiences

From the communications planning efforts described in the previous chapter, the technical audiences that are likely to have an interest in the outcome of the HPV chemical testing program, and the subsequent data interpretation will include:

- Environmental and health organizations
- U.S. regulatory agencies
- Scientific community (academia and think tanks)
- User manufacturers/processors

The main elements that technical audiences will want to see in the HPV chemical screening-level characterization reports will likely include:

- A technical description of the methods used
- An indication of the overall “completeness” of the assessment
- A thorough discussion of the major uncertainties and limitations in the analyses
- One of the three possible priority outcomes
- A description of the details and timing for any follow-up actions (as appropriate)

In order to accommodate these anticipated reporting needs, the ACA has developed information to support the development of a technical screening-level characterization report. This document can be accessed at [URL ADDRESS FOR TECHNICAL REPORTING GUIDANCE](#). This resource addresses the anticipated data needs of the technical audiences, and also provides the information necessary to develop a report in fulfillment of the OECD SIAR reporting framework.

Consistent with the idea that, even among technical audiences, there will be varying degrees of interest in the details of the assessment, the technical reporting guidance has been structured to provide varying levels of detail to audiences with varying information needs. The initial layer of detail provides a summary of the screening evaluation, offering a synopsis of the relevant hazard and exposure information. The second layer of the technical report is embodied in the OECD SIAR format, where an emphasis on the hazard information and an abbreviated review of exposure data leads to a conclusion about the priority of the chemical for further action. Finally, a third

layer of reporting that includes expanded descriptions and documentation of the exposure assessment efforts and hazard testing dossiers is illustrated.

Non-Technical Audiences

From the communications planning efforts described in the previous chapter, the non-technical audiences that are likely to have an interest in the outcome of the HPV chemical testing program, and the subsequent data interpretation will include:

- Media
- Retail/trade customers
- Household consumers
- Local community groups near plant sites

Even within the general heading of “non-technical audience,” research suggests that there are at least two distinct subpopulations, each of whom may have their own individual communications needs. Within the U.S. population, consumer research shows that roughly 10-15% of the general public is interested in health and environmental safety data, such as the HPV chemical data. The research suggests that personal experiences, such as health concerns of a family member or local environmental issues, drive the interests of these “dedicated information seekers”. These individuals want to make informed choices about the products they use, and they tend to seek information to make these choices from a wide range of sources.

Consumers in general may not put their trust in information per se, but in the authoritative conveyance of that information by someone else whose opinion they value. Such “opinion leaders” have been shown to be critical in the effective adoption of new ideas and information. Although they represent a limited percentage of the general population, dedicated information seekers, by virtue of their interest in chemical information, could serve as potential opinion leaders to help inform broader non-technical audiences. In the case of HPV information, members of the mass media and community activists also may represent opinion leaders.

Thus, although non-technical reporting may initially be envisioned as targeting only a single audience, there actually may be (at least) two separate non-technical audiences to consider. The initial non-technical audience may consist of the dedicated information seekers, described above. These individuals are expected to be interested in a moderately detailed characterization of the HPV information, along with links or points of contact to obtain additional information. In terms of communications strategies, a more active outreach program that targets these individuals may be most appropriate.

The second potential non-technical audience is what usually gets referred to as “the general public”. A passive communication strategy that relies on informational web sites and stand-by reports may be appropriate for this audience.

There are certain essential pieces of information that both of these non-technical audiences will be expected to find to be of interest in the HPV chemical screening-level characterization reports, including:

- A concise summary of the results of the analysis;
- An understanding of the use of the chemical;
- An assessment of the overall suitability of the chemical in its current applications;
- A clear indication of what exposures were and were not considered in the analysis;
- A clear distinction between the “facts” of the analysis and the interpretive “opinions” of the sponsor;
- An indication of what will happen as a result of the testing and assessment (its priority); and,
- A source for obtaining more detailed information.

It is important to recognize that while the information needs of the non-technical audience may appear to be considerable, these are legitimate needs on the part of these groups, and it is important to provide the information in a clear, concise and readily understandable form. For this reason, the ACA has prepared a resource document to assist in the development of non-technical screening-level characterization reports. This document can be accessed at [URL FOR NON-TECHNICAL GUIDANCE](#). This resource provides sufficient context for the results, without overwhelming the non-technical audience with extraneous technical details that could obscure their understanding. Moreover, it provides guidance on how to address the variable information needs of “opinion leaders” versus “general public” non-technical audiences.

Dos and Don'ts For HPV Communication

While the communication planning work provided in this document can be a reasonable starting point for the development of an HPV chemical screening-level characterization reporting program, it is important to always bear in mind that there will always be a need to consider the “human element” in this equation. To that end, here are several pieces of “documented common sense” that should be kept in mind when developing and executing on this communications process for a given HPV chemical or chemicals:

Do:

- Accept all audiences as having a legitimate right to the information to be presented
- Plan the communication carefully, evaluate the effort and follow-up, as necessary
- Listen to the concerns of all audiences
- Be honest, responsive and transparent in all analysis and reporting efforts
- Collaborate with reputable technical resources in reporting results
- Meet the needs of all audiences, particularly the media
- Provide all information in a clear and unobscured manner

Provide various levels of reporting to meet the needs of a range of technical and non-technical audiences

Consider both active outreach and passive communications approaches when developing the HPV communication strategies

Follow up on all commitments

Acknowledge the limitations of the data and the analyses

Provide direction on how audiences can obtain more detailed information, if desired

Don't:

Put off involving key audiences in the communications planning process

Withhold any information about HPV chemicals, except to the extent that it involves confidential business information

Ignore the “human element” of the process or people’s feelings

Make reports for non-technical audiences unnecessarily complex, as to obscure understanding

VI. Additional Internet-Based Resources

The following additional Internet-based resources are available for use in the development and execution of a communications plan for HPV chemicals.

- ◆ A comprehensive, searchable bibliography of documents pertaining to risk communication

<http://dceps.nci.nih.gov/DECC/riskcommbib/>

- ◆ U.S. EPA's Risk Characterization Handbook, containing information on how to incorporate transparency, clarity, consistency and reasonableness into reporting

<http://www.epa.gov/ORD/spc/2riskchr.htm>

- ◆ U.S. ATSDR's "An Evaluation Primer on Health Risk Communication Programs and Outcomes"

<http://www.atsdr.cdc.gov/HEC/evalprmr.html>

- ◆ Institute of Environmental Toxicology's "Reporting on Risk – A Journalist's Handbook on Environmental Risk Assessment"

<http://www.iet.msu.edu/journalists/generalconcepts.htm>

- ◆ Resources for the Future's "Understanding Risk Analysis – A Short Guide for Health, Safety and Environmental Policy Making"

http://www.rff.org/misc_docs/risk_book.htm

- ◆ U.S. National Library of Medicine's Specialized Information Services (SIS) "Toxicology Tutor I"

<http://www.sis.nlm.nih.gov/toxtutor.cfm>

- ◆ U.S. National Library of Medicine's "Toxicology Tutor's Glossary of Terms"

<http://www.sis.nlm.nih.gov/toxtutor1/glossa.htm>