

Draft
FC Communications Plan
2001-2002

Situation:

News media attention to PFOS since January 1, 2001 has been limited. The most significant coverage, from a reputation perspective, has resulted from the following events:

- The Environmental Working Group alleged in late March that the company knew more, earlier than it has publicly shared. These charges were covered at the time on the EWG web site, CBS Morning News, one chemical industry newsletter and a European environmental publication. In August, Mother Jones magazine and the "Our Stolen Future" web site each carried pieces making a similar case.
- Geisly research results were reported in ES&T journal and provided to other news media by news release. Coverage was limited to the Twin Cities and two other locations in the US, chemical business journals, environmental newsletters, a Danish newspaper, an Austrian newspaper, and a European environmental publication.
- Rebecca Renner, a freelance writer, has written stories in Scientific American and ES&T journal relating to health and environmental issues.

The fact that the Environmental Working Group is the only significant US-based environmental group making this case is important. In fact, representatives of two environmental groups in the US (NRDC) and Europe (Friends of the Earth) had positive comments about 3M's action at the time of the phase-out announcement. Also, important is the fact that EWG has had very limited success in attracting attention from the news media. This may be due in part to the fact that 3M has taken the one significant action that anyone would ask of it: phase-out of the perfluorooctanyl sulfonate chemistry. Making a case that 3M should have acted earlier is a less appealing story than being able to demand action now.

Nevertheless, a number of events could draw news media attention. In each case, preparation is necessary to ensure that 3M is ready to take advantage of any opportunities and address any risks raised by the event. Events that could generate news media attention include:

**Exhibit
1793**

State of Minnesota v. 3M Co.,
Court File No. 27-CV-10-28862

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1793.0001

- John Geisy research on fish eating birds to be reported in September. Two additional Geisy studies will be published later in 2001 and 2002.
- Findings of higher levels of PFOS in fish near the Decatur plant outfall – Sept.
- Results of the 2-year study will be available in September but the basic information is already in the public domain. The summary table has been available for several months and an 8(e) was submitted on this regarding benign liver tumors.
- Inventors Hall of Fame to induct two inventors of Scotchgard™ on September 15 in Akron, Ohio. The official announcement was made in June.
- 3M Revised Risk Assessment to be completed in October or November.
- Product introductions and promotions – Bissell/Scotchgard TV and other promotions in late October into November
- Results of 3M/EPA discussions about 3M's revision of its 8(e) filings.
- EPA actions on SNUR.
- SETAC meeting in Washington in November. 3M, Geisy, Purdy will make presentations.
- OECD hazard Assessment – 1Q, 02.
- Society of Toxicologists – 1Q, 02
- Decatur Mortality study follow-up to determine the number of incidences among 3M Decatur employees compared with the number expected. This is due in the spring of 02, and early indications are that the number of incidences will be in line with what is expected. An 8(e) was filed as a result of findings from the original mortality study indicating a higher than expected rate of bladder cancer deaths.
- Results of a POSF inhalation study in rats to examine impact on the bladder. This is the material that workers were most exposed to. Draft due as early as 2Q, 02.
- PFHS study related to children. Draft due as early as 2Q, 02.

Further, we should be ready to address information that has already been submitted to EPA and OECD. These include studies related to children's health and reproductive health.

Objectives:

- Protect and enhance 3M's reputation
- Contribute to an orderly transition to new products and processes
- Put the issue behind us

Audiences:

- Public
- Customers
- Employees
- Regulators

- Public policy makers
- Scientific community
- Competitors
- Interest groups
- News media

Strategies:

- Continue behavior consistent with 3M values.
- Maintain optimal flexibility
- Anticipate and prepare for actions that may generate news media attention
- Seek opportunities to tell positive story – new products, etc.
- Respond to media inquiries as appropriate
- Avoid providing a platform for antagonists
- Avoid tying 3M to related compounds to the extent possible
- Utilize best tools available, as needed

Tactics with Strategies:

- Continue behavior consistent with 3M values
 - Continue phase-out of perfluorooctanyl sulfonate chemistry
 - Continue to work with customers and supplier for an orderly transition.
 - Continuously improve operations by participating in new EHS Management System
 - Continuously improve products through research and participation in Life Cycle Management.
 - Continue to share research findings with government agencies and the scientific community.
 - Continue to provide the public with information on 3M's environmental, health and safety programs and results on 3M's web site. Expand the web site into a sustainability report.
- Maintain optimal flexibility
 - Continue to develop talking points that speak with precision and avoid unintended commitments.
 - Continue to utilize communications training for spokespeople with an emphasis on precision to avoid unintended commitments.
 - Continue to limit the number of spokespeople to maintain consistency of message.
 - Continue 3M's message review process to prevent unintended commitments
- Anticipate and prepare for actions that may generate news media attention

- Draft talking points for issues raised by events (that could generate news stories) listed in the “Situation” section of this plan. These issues are:
 - Children’s health
 - Reproductive health
 - Decatur Mortality Study follow up on bladder cancer incidences
 - Two-year study
 - Geisy research on fish-eating birds
 - Decatur fish findings
 - 3M’s 8(e) submittals
 - Scotchgard™ and the Inventor’s Hall of Fame
 - 3M Revised Risk Assessment Findings
 - Product introductions as they come up
 - General statement on SNUR regarding PFOS
 - Summary of presentations from 3M people at SETAC
 - OECD Hazard Assessment
 - Society of Toxicologists issues related to PFOS
- Conduct communications training for internal and external spokespeople on the issues for which talking points are prepared.
- Coordinate content of speeches, interviews, presentations to ensure message consistency
- Seek opportunities to tell positive story – new products, etc.
 - Continue to work with product publicists on new product introductions and follow-up activities to encourage positive publicity. Help publicists prepare for any negatives that may arise from positive publicity.
 - Maintain updated web site with positive 3M environmental story. Consider positive statement on new products, innovation, research, etc. Note: 4,000 to 5,000 visitors to 3M environmental web site each month.
 - Be prepared to respond quickly to opportunities for positive 3M environmental stories in news media. However, do not risk a negative reaction by sending news releases that may be interpreted as “puff” pieces seeking to build reputation.
- Respond to media inquiries as appropriate
 - Consider each inquiry separately, but in general respond positively to media requests for information or statements that are clearly related to PFOS or 3M businesses.
 - Provide context in our responses
 - Consider each inquiry separately, but in general avoid commenting on situations that are not uniquely 3M’s. Refer comments on industry-wide issues to industry associations.
 - Continue with limited number of spokespeople to avoid confusion
- Avoid providing a platform for antagonists

- Comment on errors in news media coverage only if significant and seriously harmful
- Avoid debates with antagonists to the extent possible
- Avoid comments that denigrate antagonists or create controversy that may take on a life of its own
- Avoid tying 3M to issues around related materials (PFOA, etc.) to the extent possible
 - Focus 3M comments on PFOS
 - Refer questions on related compounds such as PFOA to industry groups when possible
- Utilize best tools available, as needed
 - Communications planning
 - Key messages
 - Communications training
 - Issue and detractor analysis
 - Experts – inside the company and outside
 - Surveys/Research
 - Review of science and regulatory documents, publications strategy
 - Response mechanisms for media inquiries, telephone/e-mail/mail inquiries, rumors, etc
 - Media and issue monitoring

9/05/01