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TO: T. H. Huffman, R. D. Gamblin

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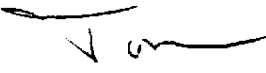
DATE: March 6, 1991

SUBJ: RESPONSIBLE CARE

Interoffice
Communication

VISTA

In case you haven't seen it, I've attached a copy of the speech given by Peter Sandman at the CMA annual meeting. The article is well worth reading. It contains commitment to Responsible CARE programs.


T. G. Grumbles

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Attachment

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Peter's
New York speech

ADDRESSING SKEPTICISM ABOUT RESPONSIBLE CARE

by

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If someone had asked me five or six years ago—at about the time of Bhopal, say—whether in 1990 the chemical industry would be actively disseminating information about routine emissions and emergency response, setting up advisory groups locally and nationally, and making environmental responsibility and public accountability conditions of continuing CMA membership, I would have smiled cynically, asked my questioner what he or she was smoking, and put the probability of these developments very low indeed. Yet they have happened.

The chemical industry, in other words, has made extraordinary progress. It doesn't subtract one whit from this progress to note that it has been (for the most part) reluctant. That's how people and institutions make progress—under pressure, whether from friends and family or from regulators and activists.

¹This pamphlet was written by Dr. Sandman, based on his November 6, 1990 presentation to a Chemical Manufacturers Association meeting in New York City. For additional copies of the pamphlet, write the CMA. For a list of Dr. Sandman's other publications, write for the Publications List of the Environmental Communication Research Program, P.O. Box 231, Cook College, Rutgers University, New Brunswick, NJ 08903.

- The most potent symbol of that progress, I think, is Responsible Care.

Let me very briefly trace the history of the chemical industry's progress for you, in three stages. (I will later suggest a fourth stage that I think we're beginning to enter.)

Stage One, which dominated your industry until shortly after Bhopal, I would call the stonewall period—not quite the Stone Age, but the Stonewall Stage. It was characterized by the conviction that the public badly misunderstood chemical risks. People, you told yourselves, were flat-out wrong about chemical risks, ignorant or stupid or both, manipulated by sensational mass media and communist environmental groups. Since people were irredeemably irrational about chemical risks, it followed that the best way to deal with the public on such matters was not to deal with the public at all. Ignore them if possible, mislead them if necessary, but for heaven's sake don't level with them about risk: They'll only screw it up.

Stage Two dominated from 1986 until perhaps 1989. It began with the realization that ignoring or misleading the public tended to backfire. When people were ignored or misled, you discovered, they tended to get angrier, more frightened, and more inclined to interfere. Instead of leaving people out, this new doctrine suggested, what the industry needed to do was to educate people about chemical risks. I would call this the missionary period. It held that the public is wrong about chemical risks, but educable; the job is therefore to teach people that chemicals are safe and that chemical plants are good neighbors.

Stage Three—the stage that best characterizes Responsible Care—began in earnest just a year or two ago, with the growing awareness within the industry that in some ways

- chemical plants haven't been such good neighbors after all. Your industry hasn't kept its emissions as low as you practicably could. You haven't taken health and environmental protection as seriously as you now wish you had. Perhaps even more important, you haven't built a good record of open communication with the communities in which you operate. Too often you have been arrogant or uncaring; sometimes you have been dishonest. Because of these failures, the widespread distrust and dislike of the chemical industry is in some fundamental sense justified—even though the widespread conviction that your industry is responsible for most of the world's cancer and pollution is not.

In some of my own speaking and writing, I have distinguished two different definitions of risk. The technical definition—expected annual mortality, for example—I relabeled hazard. The public's definition, though, is much more influenced by the factors I have collectively called outrage: trust, fairness, control, dread, etc. Reframed in this terminology, the core communication problem of the chemical industry is that you need to reduce the outrage, not just the hazard. To reduce outrage, of course, you need to listen to people, not just talk to them. The insight that this is true makes the third stage the dialogue period.²

In a nutshell, the goal of the stonewall period was to keep your neighbors out of your business. The goal of the missionary period was to explain to your neighbors why they were wrong and you were right. The goal of the dialogue period is to understand

²See Peter M. Sandman, "Hazard Versus Outrage in the Public Perception of Risk," in Vincent T. Covello, David B. McCallum, and Maria T. Pavlova (eds.), Effective Risk Communication (New York: Plenum, 1989), pp. 45-49. For guidance on reducing outrage, see Billie Jo Hance, Caron Chess, and Peter M. Sandman, Industry Risk Communication Manual (Boca Raton, FL: CRC Press/Lewis Publishers, 1990). A videotape of Dr. Sandman explaining the hazard-versus-outrage distinction and its implications for risk communication will be available in May 1990 from the American Industrial Hygiene Association, Akron, OH.

- and respond to the ways in which your neighbors have been right ~~all~~ along, and your industry wrong. The hope is that when the chemical industry responds more appropriately to public outrage, the outrage will be reduced and will no longer cloud people's understanding of the hazard. Before you can teach people how low the chemical hazard is, in other words, you must first learn from them how high the chemical outrage is—and take serious steps to reduce it.

That your industry has achieved this transition from stonewall to missionary to dialogue in a few short years is extraordinary. I am impressed.

The problem is that the public is not impressed, and not (at this point) willing to be impressed. This has got to be terribly frustrating for your industry. Like any reformed sinner, a corporate official who has shifted from stonewalling to missionary work, and from missionary work to genuine dialogue, expects a little praise—maybe even gratitude—from the beneficiaries of the shift. And what do you get instead? All too often people don't believe you've changed at all. Even if they believe you, they think you were awfully slow to change. And their resentments and demands don't disappear overnight. In fact, the sense of grievance might even increase some for a while, as the community discovers its own power and thaws from passive, fatalistic hostility to more active criticism. (Scholars of race relations have dubbed this awkward transition phenomenon "the revolution of rising expectations.")

Now I am convinced that as a long-term strategy dialogue is a lot healthier for the chemical industry than stonewalling, or even than the missionary position. But in the short term, it hurts. What can you do to reduce the pain? How do you communicate

your new approach, when almost anything you say about it is likely to be seen as self-serving? How do you respond to public skepticism?

Let me broaden my definition of the problem here. It isn't just the CMA's Responsible Care initiative that needs to be communicated, but more broadly the chemical industry's new approach to environmental responsibility and public accountability. And it isn't just the public—regulators, legislators, local officials, plant neighbors, and environmentalists—who are skeptical. I think you face internal skepticism as well—from employees, from boards of directors, from various constituencies within your companies and within your industry...even from yourselves. I want to deal first with the critical issue of how to respond to the public's skepticism. Then I want to say a few things about responding to internal skepticism.

Communicating in the Face of Public Skepticism

When Responsible Care was first planned, the industry realized that the public would be skeptical, and intended therefore to avoid publicizing the program until it had achieved a track record. But the CMA's Public Advisory Panel recommended strongly against waiting. What would happen if you waited for a track record? People would take offense at the delay. They would ask, "Why didn't you tell us you were doing this?" They would resent the lost opportunity to participate, to help set standards and help monitor performance. At its worst, the failure to set standards publicly and accountably would be seen as a failure to set standards at all—as if you had hit the barn wall with the arrow and painted the target on afterwards. Survey data suggest that public distrust of

the chemical industry is increasing, not declining; waiting would ~~only~~ lead to still lower credibility.

Communicating now is therefore essential. But is communicating at all, now or later, a lost cause? I think not. Several factors offer grounds for hope:

- Focus groups consistently show that people respond well to industry straight talk. People don't want to dislike and distrust the chemical industry—they know they depend on it and would rather be for you than against you.
- People's attitudes can change. The last decade has seen radical changes in how Americans see the Soviet Union, China, gender, race, homosexuality. Look at the changes in how the chemical industry sees the public! If you can change, so can your neighbors. Your industry doesn't have to be our society's favorite villain forever.
- The recession we appear to be entering provides an almost ideal communication environment. Companies have sometimes resisted establishing a dialogue with their communities out of a concern that the dialogue might get out of hand, that public demands and intolerance might escalate, that listening to the community might be the first step down a primrose path that could end with the community shutting you down. I think that fear was unjustified even in the flush years. But shutting you down is obviously a nonstarter when economic times are bad, when the community is more-than-normally sensitive to the importance of jobs and a stable economic base. I am not suggesting that you should tell people they need the jobs and damn well better not shut you down; economic blackmail tends to

backfire. What I am suggesting is that when people are thinking about the economy is a good time to begin a dialogue about risk. Just as you try to schedule major plant maintenance for slack periods, when you don't need all your capacity, the best time to do "maintenance" on your relationship with the community is when the demands on that relationship are lightened by economic concerns.

Now is the time to talk. But still, the response is bound to be skeptical. So what should you say?

Let me start with what you shouldn't say. The only mass media advertisement so far published by the CMA on Responsible Care came the week of Earth Day 1990. Much about the ad was excellent, and the response on the CMA's 800 number was very positive—so the ad was by no means a failure. Still, in some ways, I think, it struck the wrong tone.

I remember the headline: "Over 170 leading companies are saying, 'We're responsible.'" This head, like the name "Responsible Care" itself (though you're stuck with it now), has a built-in ambiguity. "Responsible" meaning "it's our job, our responsibility, our fault if we screw up" is all to the good. "Responsible" meaning "we do a great job, you can trust us" claims too much. Internal communication has to stress the need to be responsible in this second sense. But external communication should make a lesser claim, because the claim of responsibility backfires. We know you're not responsible. We know we can't trust you. When you tell us how responsible and trustworthy you are, you play into our paranoia—you provokes cynicism, irritation, even alarm.

Let me quote selectively from the first few paragraphs of ~~that~~ Earth Day ad: "Today, the future is in our hands.... That's why the members of the Chemical Manufacturers Association have joined together to establish the Responsible Care Initiative...our commitment to continuously improve our performance.... The CMA...has already been a prime mover in implementing Title III...[o]ur ongoing education programs are training more than a million workers.... Now...we are committing to do more...." The commitments that follow are terrific, and so are the ad's last few paragraphs, inviting people to get involved and acknowledging that "a lot of people are unhappy with chemical companies." But that beginning! Chemical companies have always loved the environment more than profit, the ad seems to be saying, and now we're really going all out. Who needs Greenpeace, or even EPA, when you have the CMA to protect your health and environment?

What can you claim? I want to list five themes I think can work. But first, two qualifiers.

First, this is not a set of themes designed to appeal to the chemical industry. Too many advertising campaigns are aimed more at the client than at the customer--and maybe CMA member companies need that kind of moral support. But it's expensive, not just in dollars but in credibility as well. At the risk of bruising chemical industry egos, I suggest a focus on chemical industry publics instead. (If you don't like the themes that follow, in other words, I may not have the wrong themes, just the wrong audience.)

The second qualifier is that no communication campaign, however shrewd, is going to overcome the past quickly, or protect you from backlash if the future doesn't add up to real improvement. CMA implementing Responsible Care is like a repentant sinner outlining his plans to reform—and any time a repentant sinner promises to reform, the stakes go up. Even if you live up to your promises, it will take people a long time to believe you. If you don't live up to your promises, you will dig yourself a still deeper hole of mistrust and unwillingness to forgive.

That said, let me list what I see as five viable themes for public communication about Responsible Care—or about similar initiatives by individual companies.

1. *"Responsible Care represents a real change. In its focus on protecting the environment, on leveling with the public, on listening to the public, and on policing those companies that misbehave, Responsible Care is a new, scary initiative for the industry. In other words, the chemical industry has a poor track record. It has not in the past done a good job of protecting the environment, leveling with the public, listening to the public, or policing companies that misbehave."*

The bulk of the American public "knows" (whether we are right or not) that your track record is poor. For those in the industry who think your record is excellent, the temptation is understandably enormous to say so, early and often. Without taking a stand on whether the record is as good as you think it is or as bad as the public thinks it is—I suspect it is neither—let me stress the important communication issue. It's a great handicap to begin a communication campaign by telling people they're wrong.

Any claim to future responsibility works best if you ground it in acknowledgements of past irresponsibility. At least you should avoid grounding it in claims of past responsibility. This is partly a matter of credibility; how can we believe you are turning over a new leaf if you keep claiming there was nothing wrong with the old leaf? But it's also a matter of forgiveness. How can we accept your apology for your past if you keep insisting you have nothing to apologize for?

It is hard for most chemical companies to acknowledge that their new policies are in fact new. I have several times watched clients wrestle with themselves and ultimately decide, courageously, to try X instead of Y...only to undermine the new approach by announcing the change as "yet another step in the company's longstanding commitment to X." One of the most common (and most transparent) examples of this error is to pledge a huge reduction in emissions, then depict it as an example of your company's long-established environmental concern; if the concern were so long-established, the emissions would have been reduced long ago, and you wouldn't be able to achieve those 60-90% reductions.

2. *"We are changing because we have to. Just as we are not claiming that we always loved the environment more than profits, we are not claiming that we woke up one recent morning loving the environment more than profits. The change is in response to public pressure and legal pressure. We have discovered, in other words, that environmental responsibility and public accountability are good business. Getting ahead of the regulatory curve; minimizing liability suits; having good relations with local communities, regulators, and activists—these are all major competitive advantag-*

es. In a real sense, we are cleaning up our act because we have to. The credit goes to environmentalists, regulatory agencies, plant neighbors...not to us."

It is understandably appealing to the industry to claim the moral high road, but depicting Responsible Care as a business necessity has several powerful advantages. First of all, it's closer to the truth (always an advantage). At industry meeting after industry meeting, the message is the same: "This is what the public demands. Our license to operate is at stake." What you say to each other is precisely what you should be saying to the public. Besides being more accurate, this message is also much more credible. If you tell us you are cleaning up because you care so deeply about the environment, those of us who question the depth of your environmental commitment are bound to question the truth of your cleanup claims. But if you tell us you are cleaning up because you're afraid otherwise we'll shut you down, because you've noticed that the zeitgeist has shifted and you must change to survive, that we can believe.

A third advantage of telling us you have to clean up is that it meets the society's need to defeat you. People don't want their villains to have a voluntary change of heart. We feel cheated by such conversions; they're anticlimactic and very irritating. What people want is to get the villains by the short hairs, to force them to knuckle under. Think back to the major quarrels in your own life. Ironically, we forgive those we have beaten much more quickly than those who have suddenly and unaccountably switched over to our side. Activists in particular have earned their victory over the chemical industry. Your management may feel better pretending that its change of heart is

voluntary, not a response to pressure. But for those who spent years applying the pressure, the pretense is offensive...and makes it harder to notice that the change is real.

3. *"We want you to track us, not trust us. Over the long haul, we hope to earn your trust...but that is a long haul. For now, the byword is accountability. Here are our goals for 1995. We'll keep you apprised between now and then of what has worked and what hasn't. Come 1995, you will know where we fell short and where we did well. In fact, we are setting up national and local advisory committees to look over our shoulder, to ask the tough questions and insist on proof of the answers...and to blow the whistle if we're not living up to our promises. Our strategy, in short, is to put ourselves in a position where we have to live up to our promises or face the consequences."*

Once again, this is a matter of credibility. When trust is low, asking to be trusted is always unwise. The paradox of trust is that it builds faster when it isn't demanded. This paradox is so deeply embedded in our culture that our stereotype of the sleazy used car salesman (or presidential candidate) has him begging, "trust me."

For the foreseeable future, I think all chemical industry claims should lean very lightly on the public's trust. Preparing to prove your Title III emissions reductions, for example, is far superior to simply asserting them. An independent environmental audit is no more insulting to your corporate integrity than an independent financial audit. When a community group asks to tour your plant with an expert in tow, it may feel like your honor is at stake. But what is really at stake is your dominion, your ability to control what goes on without questions or suggestions from interfering outsiders. The

- essence of dialogue (the essence of Responsible Care) is learning to put up with questions and suggestions from interfering outsiders—learning to be accountable.

4. *"We solicit your involvement—especially if you don't believe us. The best thing about Responsible Care is the role it provides for concerned citizens. This is largely a matter of accountability—you can watch over our shoulders to make sure we're not just blowing smoke. But it is also a chance for communities to provide real help and advice. On the national and the local level, citizens can begin to play a hand—demanding data, setting standards, suggesting mitigation possibilities, preparing emergency management plans. What Responsible Care is really all about is responsiveness, listening and responding to community concerns."*

The best reason for communicating about Responsible Care now instead of later is the opportunity it gives you to let people help design the program—not only making sure you do what you promise, but also helping you develop promises that speak to their real concerns. A program that your neighbors and critics have helped design is far more likely to meet their needs...and yours.

The invitation to get involved has to be very explicit to be believable. I envision Responsible Care ads in local newspapers with a coupon for people who want to play a role; ideally, each coupon would be passed along to local companies in the respondent's neighborhood (with a follow-up program to make sure the companies didn't drop the ball). The invitation needs to embrace the skeptical, not just the "cooperative"; and the involvement that results must entail real impact, not just cooptation.

At the same time, successful involvement programs don't always yield all that much involvement. As my colleague Caron Chess has noted, people who have struggled to batter down your industry's locked door may feel little need to enter once they see the door is open. Those who have fought for the right to provide input may—once they have won that right—decide to go bowling instead. You measure success not by the number who participate, but by the number who feel welcome to participate.

It's amazing to me how frequently companies neglect the benefits of involvement. Executives are accustomed to engineering "buy in" within the company for new policies, recognizing that a consensus product is likely to be objectively better and emotionally more acceptable. But consulting with outside critics is somehow seen as demeaning or dangerous. Every few months some company asks me to look over a draft of a new environmental policy; rarely has management offered the draft to activists for their comments. An industry critic (local or national) who hasn't been consulted about an initiative is almost duty-bound to find it inadequate.

5. *The chemical industry is excited about these changes. True, the industry has moved toward environmental accountability and Responsible Care reluctantly, belatedly, and under pressure. But it is also true that many in the industry are no longer reluctant. Companies are discovering that environmental responsibility and community responsiveness have real benefits—morale is up as the pressure to do right increases and the pressure to do wrong recedes, companies with good environmental records are discovering a recruitment advantage, process changes provoked by SARA Title III are*

- *turning out profitable, etc. The new approach is triggering a wave of creativity and excitement and self-respect."*

I wouldn't oversell this message; of the five themes it's the least important. But it incorporates the credit the industry really does deserve—you didn't reform voluntarily, but you are, I think, beginning to like the new you. Quietly, unboastfully, this is worth saying.

Responding to Skepticism Within the Industry

If the public's skepticism were the only skepticism you faced, your job would be tough enough. But you face a still more troublesome skeptic: the industry itself. As a consultant, speaker, and traveling nudge, I get to work with people at every level of the chemical industry, and I have found one common denominator: everyone figures someone else in the industry is blocking change.

Those low down in the pecking order tell me that they receive lots of beautifully worded new policy statements on Responsible Care and the like, but very little to persuade them that they're supposed to take the statements seriously. And when they do try to take the statements seriously, and devote real time and real resources to dialogue with the community, their supervisors are more likely to stop them than to reward them. Top management sees it differently. The corporate office is likely to complain about plant personnel who are stuck in old patterns, who argue that community relations simply isn't important when you have a plant to run and deadlines and production quotas to meet.

There is one uniting factor: Everyone agrees the lawyers make things worse.

Earlier, I described three stages of chemical industry progress, and said I would suggest a fourth stage in the making. Call it the organizational period. Earlier stages progressed from "how do we freeze the public out" to "how to we explain ourselves better" to "how do we foster a dialogue." But we know a good bit now about how to foster risk dialogue between chemical companies and communities—and a lot of companies are finding that even after they have figured out how to do it, they're still not always able to do it. The key question of the organizational stage is therefore: "How do we become the sort of company that can foster dialogue?"

This is a big question with complicated answers, but addressing internal skepticism is one of the most important answers. Let me suggest eight rules of thumb. (Since you're high-ranking people, I will focus on communication down the organization. But remember that upward and lateral communication are just as important.)

1. *Describe the change as a change.* This is the same advice I offered for dealing with the public's skepticism. If you tell your employees that the new policy is just a continuation of the old policy, you can't be too surprised when they continue the old behaviors. As one company manager put it to me recently, "They didn't really mean the last three environmental policies. Why should I think they mean this one?" The same goes for advocacy upward. I have a client that spent months developing a new approach to environmental community relations—a very exciting approach, I think—then presented it to the board of directors as really just an extension of current practice. You can't unite people behind a change, or even convince them you mean a change, without

acknowledging that it is a change. It's hard enough to sell "this time we mean it"; it's impossible to sell "we've always meant it" to an internal audience that knows better.

2. *Send signals through the system that you mean it.* Everyone who functions well within complex organizations is adept at distinguishing the instructions they're supposed to take seriously from the instructions they're supposed to pay lip service to. (That's why there is such a thing as a "rulebook slowdown"—because the rulebook is always full of rules you're supposed to ignore.) What are the signals that you mean it? They're different in different companies, but four that keep coming up are:

- Job descriptions. Is communication a formal part of people's jobs?
- Performance appraisals. Are people judged by their communication efforts?
- Planning documents. Do annual plans and proposals for new programs get sent back for revision if they have no communication component...or one that fails to stress dialogue sufficiently?
- Budgets and schedules. Is there money for people to do what you're asking them to do, and an explicit acknowledgement that serious dialogue may slow down other goals, at least until citizens get used to partnership? Or are you asking employees to do the job *within* existing budgets and schedules—that is, to do it with smoke and mirrors—that is, not really to do it at all?

3. *Make sure the rewards and punishments in the system match your new goals.*

Ultimately, people do what pays off for them, not what pays off for the company or the industry—and it's management's job to make sure that what pays off for them is what pays off for the company or the industry.

Put yourself in the shoes of a new plant manager who figures on being at that particular site for two or three years. The last plant manager shoved a lot of problems under the rug. If this one starts acknowledging them, he or she is going to have to endure a good deal of pent-up anger and suspicion; the resulting furor is likely to get into the papers, cost money, maybe even slow down production. Taking the hit now, before things get even worse, is best for the company and the industry. But what's best for the plant manager? Arguably, it's following the last plant manager's example and shoving problems under the rug. With any luck, the new manager will be gone by the time the explosion occurs. Even if it happens on his or her watch, a plant manager is likely to get more sympathy and more help from top management for a "sudden inexplicable" explosion of public outrage than for a more controlled release that was provoked on purpose. When a boiler explodes, you check to see who didn't do the right preventive maintenance. But when a community explodes, the plant managers who let the pressure build don't usually pay the price...though the company does and the industry does.

Similarly, at the end of training programs I sometimes ask participants to list things they might do differently in their own jobs to address community outrage more effectively. Then, if I'm brave enough, I ask them to divide their list into three categories: the things they can do on their own; the things their supervisors and others in the company are likely to reward them for doing and help them do; and the things supervisors and others are likely to stop them from doing or punish them for doing. The best ideas are usually in the third category—and of course they are never implemented.

Another telling question I sometimes ask: Do you know anyone in a technical position in

- your company who got promoted for doing good risk communication, or whose career suffered for not doing good risk communication? So far, the answer is seldom yes.

Even community relations specialists are not always rewarded for good risk communication. A client recently saved tens of millions of dollars—and avoided a possible donnybrook—by negotiating with environmentalists and neighbors to let the company dispose of some low-level radioactive waste internally. When the communication specialist who handled the program wrote it up as a model for others in the company, she was told to stop blowing her own horn, and her report was suppressed.

4. *Don't blindside anyone.* In risk communication training programs, I often ask participants to identify others in the company who need to get involved in order for the change to work. Then I ask who in the company is likely to oppose the change. This is a trick question, because there shouldn't be anyone on the second list who isn't also on the first—that is, people who are going to get ignored in the planning until the last possible minute because the people doing the planning expect them to be a pain in the neck. In practice, unfortunately, there is usually little overlap between the two lists.

It is extraordinary to watch people newly committed to leveling with the community and the activists decide that they'd better not level with, say, the legal department. Of course, blindsiding opponents is as much a mistake inside the company as outside the company. Like external critics of the chemical industry, internal critics of community dialogue need to be engaged in their own dialogue. As Lyndon Johnson once said, it's better to have them inside the tent pissing out than outside pissing in.

5. *Provide help with risk communication skills-building.* When I was at Three Mile Island, I asked Jack Herbein, the Metropolitan Edison engineering vice president who managed the accident, why he so consistently ignored the advice of his PR specialist, Blaine Fabian. He told me, "PR isn't a real field. It's not like engineering. Anyone can do it." That attitude, I think, cost MetEd and the nuclear power industry dearly.

This advice is obviously a little self-serving, since I sell communication training, but I think it's also good advice. Although risk communication skills are learnable, they're not bred in the bone—certainly not bred in the bone for the average chemical engineer. People need training. They also need support for their new skills after the training: a newsletter reporting on risk communication efforts within the company (CMA's materials along these lines are wonderful); a monthly bag lunch or a quarterly meeting for people to share their risk communication successes and problems; access to a risk communication specialist (in-house or outside) for quick consultations on thorny problems—these are all proven ways to cement the training. Communication, in short, is a skill. You don't just order people to do it. You show them how.

6. *Assess the internal communication climate.* How can you share risk data with the community that you are not willing to share with employees? How can you learn to tolerate open discussion, even disputation, with outsiders when open discussion among plant executives is frowned upon? How can you level with a local environmental group when you are reluctant to level with the corporate head office? Companies differ substantially in their internal communication climates. And I think it is fair to say that, over the long haul, external communications can't be more open, more honest, a better

dialogue than internal communications. Either the external successes will set a standard that undermines the old internal norms—or, more likely, the internal norms set a limit on what anyone is willing to try externally.

The companies that nourish robust debate on the inside will find it comparatively easy to expand the list of participants to include neighbors and activists. The companies that have trouble encouraging dialogue internally, on the other hand, are going to have just as much trouble encouraging it externally—and to make progress they will have to target both problems at once.

7. *Start with small pilot projects.* The transitions from stonewalling to missionary work to dialogue are difficult transitions, and they don't happen all at once. To plan on a sudden radical shift in communication posture is to plan on dislocation, resistance, and backsliding. Everyone (especially the skeptics) benefits from a more gradual approach. Small pilot projects give people a chance to hone their skills, to find out what works and what backfires, to identify problems and cope with them, and above all to discover that the new approach is survivable after all. Well planned innovations begin with formal pilot projects, with clear goals and an explicit evaluation component.

I have found it fascinating how much resistance I encounter to this fairly obvious recommendation. I don't think it's just that top management is used to ordering top-to-bottom policy changes; in other areas (quality, for example), the need to engineer change in measurable increments is well established. Perhaps this particular change is overdue, and the pressure on top management is too great for an incremental approach. But I sense something else. No matter how great the rush, no chemical company would put a

- new manufacturing process on line without piloting it first in the ~~tab~~. It's as if technical people were reluctant to see communication as also technical, as an empirical science of sorts where it is possible to conceive, test, and reject or accept hypotheses. I find more clients are willing to take my advice than to test it—as if a communication specialist were a witch doctor whose magic spells had to be taken on faith. Communication may be important, clients seem to be saying, but it sure as hell isn't science.

Seeing communication as the sloppy-but-improving empirical science it is may help you see a new approach to communication as something that should begin with carefully evaluated pilot projects.

8. *Don't oversell the new approach.* I think Responsible Care and similar industry initiatives are important improvements. But they don't guarantee a passive public, a decline in government regulation, a good market for chemicals, or a good sex life. Nor is this change cost-free. I mentioned the revolution of rising expectations earlier, but it's important to bear in mind: The first thing people do when you belatedly start listening to them is complain. Early experiments with dialogue are bound to go awry sometimes; it's a new effort for you and the community both. If you tell your board, your employees, and yourself that the new approach is a painless solution to all your problems, you are setting your company up for disappointment and disillusionment. And you are setting the skeptics in your company up to say they told you so.

Addressing Your Own Skepticism

I want to end this presentation by saying something about the least acknowledged skepticism of all, our own skepticism. I just finished work (with colleagues Stefanie

Silverman and Andrea Ricker) on three case studies of chemical plant community outreach programs, all of them chosen because they were winners of CMA CAER awards for community awareness.³ They weren't bad programs. But for the most part they were one-way rather than two-way, and reactive rather than proactive. That is, the dominant approach of the three programs was to respond to expressed concern by providing reassuring information. This is of course a great step forward from the former industry norm of responding to expressed concern by stonewalling. But it is several steps short of state-of-the-art risk communication, and several steps short of what Responsible Care requires.

To the extent that their communities are actively making demands, the three programs are prepared to listen and respond. But for the most part their communities are not actively making demands. They are more characterized by simmering discontent, by passive hostility that has to be elicited before it can be responded to. The three programs we studied are not prepared to do this.

The plant executives we interviewed for these case studies enunciated remarkably progressive policies about community outreach. But the programs they had developed to implement these policies were modest and reactive. And for a number of the key interviewees, lying just beneath the surface were some attitudes that were truly incompatible with the new policies—discomfort with their new visibility and their new role as a source of information, not just of chemicals; frustration at the community's seemingly

³Stefanie M. Silverman, Peter M. Sandman, and Andrea Ricker, CAER in Practice: New Jersey Chemical Companies Explain Chemical Risks to Their Communities (New Brunswick, NJ: Environmental Communication Research Program, Cook College, Rutgers University, 1990).

simultaneous lack of trust and lack of interest; often something ~~very~~ close to contempt for the media, the environmental movement, the political establishment, and even the public itself. Although they were undertaking serious efforts to do community outreach, several interviewees seemed to be doing so with reluctance, and without conviction that it was worth doing.

This is not surprising, and not culpable. Like individuals, institutions change in stages, not all at once. Policies change before practices, and practices change before attitudes. When an institution is in flux—as the chemical industry is today—it is easy to find inconsistencies: policies that are not borne out in practice, practices that are belied by attitudes. Distinguishing the hypocrisy of an organization pretending to change from the anguish of an organization trying to change is not easy. I believe, tentatively and hopefully, that I am witnessing the latter, not the former—in our three case studies and, more generally, in the industry as a whole.

Let me put the point more baldly. When you say you want an open dialogue with the public about chemical risks, I am not sure you mean it. Moreover, I think, you are not sure you mean it either. And that's okay, that's your own skepticism. When people are making difficult changes, they're often not sure whether or not they're sincere. Think back to a time when your personal values on some important issue were in flux? Weren't there moments when the new values felt tentative, unstable, even hypocritical? Corporate change, like individual change, is often wrenching.

Recognizing that genuine change often feels hypocritical at the start, Alcoholics Anonymous has a wonderful slogan: "Fake it till you make it." That, I think, is where

Responsible Care stands today. Sometimes you mean it. Sometimes you're faking it, trying to mean it but not always successfully.

This speech was entitled "Addressing Skepticism about Responsible Care." The most important point to remember, ultimately, is that the skepticism is appropriate—the skepticism of the public, the skepticism of others in your company, and your own skepticism. No one knows how the new approach will work. And no one knows whether or not your industry will hang in there. So by all means proclaim your commitment to Responsible Care from the rooftops. But proclaim also that the commitment is a new one, and a difficult one to carry out. Expect the skepticism. Welcome it, even, as a challenge to prove the genuineness of the commitment. And when your own skepticism rears its ugly head, fake it till you make it.

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