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FROM: T. G. Grumbles
DATE: December 6, 1989

Interoffice
Communication

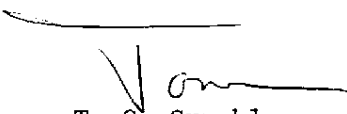
SUBJ: ENVIRONMENTAL "FRIENDLY PRODUCTS"

VISTA

Attached is an alert from CSMA regarding two EPA activities in the area of environmental friendly labeling. It appears EPA will be moving forward with plans to develop a consumer education process on relative environmental risks of products.

I also heard from SDA today that Unilever Canada, is actively promoting phosphate free detergents as environmentally friendly.

By copy of this memo, I am asking Joe and Mike to assure the CLER communications committee is aware of these issues.


T. G. Grumbles

dlj
.905

Attachment

Distribution: W. J. B. Vogel, Ron Bryan, Carl Kerfoot, John Roheim, Allen Nielsen, Mike Reynolds

cc: J. C. Ledvina

VVV 000007278



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M E M O R A N D O M

To: All CSMA Members

From: Ralph Engel 
President

RE: EPA Project to Rank Consumer Products

We have recently learned that the EPA/OAQPS has initiated a project to rank consumer products according to the environmental risk or (potential) hazard they pose. OAQPS has formed a consortium of various federal agencies, EPA program offices, environmental groups, and state organizations to inform the public that certain products pose environmental hazards. The project will focus on a class of consumer goods to be determined through four stages. Once a product group is chosen, EPA will perform an analysis of the human health and environmental risks associated with the products. A risk "score" will be applied to the products, and a report will be written for consumers and manufacturers to use in comparing product risks. Please review the enclosed document.

The EPA- Office of Pollution Prevention has initiated another related project based on Europe's "blue angel". This blue angel label would be similar to a Good Housekeeping seal of approval on consumer products by designating which products are not considered harmful to the environment.

We believe the scrutiny of our products by EPA and its consortium has no basis. We plan to address this issue immediately. We will meet with OAQPS (Mohin and McCullough) next week in Research Triangle Park, N.C. and Pollution Prevention later this month.

For further information, please contact Soonie McDavid at (202) 872-8110.

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I. TITLE

Consumer Product Comparative Risk: Market-based Pollution Prevention.

II. LEAD ORGANIZATION

Emission Standards Division (ESD)
Office of Air Quality Planning and Standards (OAQPS)
Timothy Mohin - FTS 629-8348 or
Melissa McCullough - FTS 629-5646

III. GOALS AND OBJECTIVES

Every day, the American consumer makes dozens of decisions that may have direct or indirect impact on public health and the environment. Paper bag or plastic at the grocery, stick deodorant or spray, call the plumber or buy some chemical drain opener, cloth diapers or disposable, fast food in styrofoam or paper -- these alternatives vary in the cumulative risk they create by their production, transportation, use and disposal.

If consumers were aware of the comparative risks of product alternatives, conscious choice could influence market demand. That this kind of approach can work is evidenced by the dramatic changes we have seen in the market place as consumers have acted on health information regarding fiber, cholesterol, and chemicals in their foods.

Because the scope is broad and risks involve consumer protection as well as multi-media impacts, OAQPS will work with the CPSC, FDA, NRP, industry groups and other EPA program offices. Our specific objective is to examine the full risks of some products from cradle to grave--to provide a screening evaluation which would result in the selection of a focused group of products, a detailed risk "scoring" of each of the alternative focus products, and then generic guidance for future work on how to perform and distribute comparative risk analyses for consumer products.

Our ultimate goal is that the public will become aware that everyday habits carry costs and benefits and that they will weigh those out when making consumer decisions.

IV. IMPLEMENTATION PLAN AND SCHEDULES

This project would be a cooperative effort involving the participation of several Federal agencies and EPA program offices as well as other groups representing industry and environmental interests (see Division of Responsibility below). The combined expertise of these groups in the areas of human health risk, environmental risk, consumer products and public education would be employed on a steering committee. This committee would have responsibility to oversee large issues and concerns regarding the

direction of the project, but specific management decisions on how the study should be conducted and expenditure of resources would be delegated to a smaller group to be chaired by OAGPS. It is expected that this project will consist of four general tasks.

Task 1: Screening: Months 0 - 6

A qualitative risk analysis of a wide range of products to develop a focus on a class of products for the initial comparative risk study. This task would involve identifying groups of consumer products and ranking them as to their relative importance with regard to health and environmental impacts. Finally, the steering committee will choose a group of consumer products as the focus of this project.

Task 2: Risk analysis: Months 7 - 15

This task would involve an in-depth analysis of the human health and environmental risks associated with the group of consumer products selected in Task 1. Risks associated with all media will be estimated from raw material processing to final disposal of the focus product group, culminating in a risk score to be used for product comparison.

Task 3: Report preparation: Months 16 - 20

This task would result in a report directed at consumers and producers of the focus product group describing the cumulative risk associated with alternative products. Another report would also be developed that would provide an outline and guidance for future comparative risk projects involving other product groups.

**Task 4: Information distribution and evaluation:
Months 21 - 24**

The steering committee will decide on a communication strategy to distribute comparative risk information to the consumers and producers of the focus product group. This strategy will include a public education aspect which will ensure that the risk information provided in the report will be easily accessible and understandable. In addition, an evaluation of the effectiveness of this approach to pollution prevention and guidance on how to replicate the approach for other product groups, will be created based on the results from the pilot study. Dependent on the evaluation of the pilot study, the guidance document will be publicized as a tool for the expansion of this approach.

V. PRODUCTS AND OUTPUTS

This project would create three products.

1. Screening evaluation document. This will be a brief report with a qualitative risk analysis of a wide range of alternative consumer products -- resulting from Task 1.

This will include:

(a) As complete a list as possible of products used regularly in and around the home; and

(b) a listing per-product of risk considerations, such as limited vs renewable natural resource, recyclable/non-biodegradable/biodegradable, toxic production materials, toxic production emissions/effluent, high transportation energy use, toxic use emissions, frequency of product or disposal abuse, means of disposal and fate/impacts after disposal.

2. Product Group Risk Assessment Report. This document will contain the in-depth risk analysis of the focus group of products--resulting from Tasks 2 and 3. This will include:

(a) An explanation of the rationale for selecting the focus group of alternative products; and of the methods for scoring product risk;

(b) a complete listing per product of the risk considerations, such as those listed for Product 1 (b) above;

(c) the scoring of the above risk considerations and ranking of the cumulative risk scores of the alternative products; and

(d) a conclusion regarding the risk assessment of the alternative products.

3. Information Communication Strategy Document. This report will contain the risk communication strategy developed in Task 4. It will outline what information is most important for dissemination, what vehicles or media should be used for outreach, who should be targeted as an initial audience, how the risks should be explained, and potential problems in conveying this risk information to the general public. The document will also contain some examples of information material such as posters, labels, Q's and A's, etc.

VI. DIVISION OF RESPONSIBILITY

(This outlines the division of responsibilities as we plan it, please see footnote under Resources for details.)

A. EPA/OAQPS/PAB

Chair Steering Committee
Risk Assessment
Major report writing

B. Office of Solid Waste and Emergency Response

Office of Water
Office of Pesticides and Toxic Substances
Consumer Product Safety Commission
Food and Drug Administration
Serve on Steering Committee
Provide risk consideration information for areas of expertise
Ongoing review of written materials
Provide ongoing advice and comment

C. National Wildlife Federation

Industry Group(s) representing producers of focus products
Serve on Steering Committee
Ongoing review of written materials
Provide ongoing comment
Assist in Risk Communication Strategy

VII. CONTRIBUTION TO PROGRESS IN POLLUTION PREVENTION

This project proposes to prevent pollution at the pre-production stage, by eliminating market demand for products with the most "risk" (in human and environmental health measures). Public awareness of the full costs of our consumer products can result in a change in consumer patterns and a snowballing effect. Concerns about cancer and heart disease made "high-fiber" and "cholesterol" household words, often used in advertisements. Similarly, public information about the total risk associated with a consumer product can change the market picture for both the consumer and the producer.

This kind of pollution prevention can be only one part of the puzzle. Just as mobile source emissions are best reduced by a combination of carpooling, higher fuel efficiency cars and the cleanest fuels, so will production facility pollution be best minimized by adding together reduced demand for "higher-risk" products, more conventional pollution prevention practices and, where necessary, and of pipe controls. Reducing demand will make the next two steps much simpler.

VIII. ASSESSMENT AND EVALUATION

The full impact of this project will only be measurable over time. However, a consumer survey will be done in Task 4-- assessing product use, giving risk information, then asking what changes consumers would make based on that information. This would provide some basis for expanding the approach to other products or not.

IX. RESOURCES:

	FY 90	FY 91	FY 92	TOTAL
OAQPS FTE AC&C	FTE	AC&C	FTE	AC+C
	1.5	150K	1.5	150K
				300K

*Those agencies and organizations listed in Division of Responsibilities were not able to provide estimates of FTE participation or concurrence memos. We have discussed this proposal with the agencies and all have expressed interest. Several have expressed tentative agreement to participate.

