

Following up on our brief telephone discussion at NAS several weeks ago, I feel strongly that all documents and 'bulletins' related to risk carefully consider risk communication, literacy, and awareness topics and issues.

The draft document says:

"...it does not address in any detail the important processes of risk management and risk communication... the scope of this document does not encompass how federal agencies should manage or communicate risk."

later, it states:

"...work demonstrated that the environmental risks of greatest concern to the public often were not ranked as the greatest risks by agency managers and scientists."

"Informing the Public

In some circumstances, risk assessments are undertaken to inform the public through education and informational programs.¹⁴ Such programs can help citizens make informed decisions in their personal lives. For example, Federal agencies alert the public about the risks of living in a home with elevated levels of radon gas, of purchasing a sport utility vehicle with a certain height-to-width ratio, and taking long-term estrogen therapy. The dissemination of public risk information, even if it is not accompanied by a regulation, can induce changes in the behavior of consumers, patients, workers, and businesses. Sometimes, Federal agencies undertake large-scale risk assessments that are designed to inform multiple audiences. For example, the Surgeon General's Report on Smoking and Health has, over the years, contained a wide variety of health risk estimates. These estimates have been adopted in programs and documents disseminated by local and state governments, Federal agencies, private companies, and the public at large. In some cases, Federal scientists participate in an international effort to develop risk models that can be used to educate the public and inform decisions throughout the world.¹⁵"

every risk assessment shall describe the data, methods, and assumptions with a high degree of transparency; shall identify key scientific limitations and uncertainties; and shall place the risk in perspective/context with other risks familiar to the target audience.

Agencies should consider appropriate procedures for peer review and public participation in the process of preparing the risk assessment. When a draft assessment is made publicly available for comment or peer review, the agency is required to clarify that the report does not represent the official views of the federal government. Precise disclaimer language is recommended in OMB's Information Quality Bulletin on Peer Review. Public comments can play an important role in helping to inform agency deliberations.²⁴ When people are engaged early in the process, the public typically has an easier time concurring with government documents and decisions which may affect them.²⁵

p.13:

In the 1996 amendments to the Safe Drinking Water Act (SDWA), Congress adopted a basic

quality standard for the dissemination of public information about risks of adverse health effects. Under 42 U.S.C. 300g- 1(b)(3)(B), the agency is directed “to ensure that the presentation of information [risk] effects is comprehensive, informative, and understandable.”

pp.14-15:

Transparency will increase the credibility of the risk assessment, and will allow interested individuals, internal and external to the agency, to understand better the technical basis of the assessment.

p.15:

Every risk assessment should contain an executive summary which discloses the objectives and scope, the key findings of the assessment, and the key scientific limitations and uncertainties in the risk assessment. Presentation of this information in a helpful and concise introductory section of the report will not only foster improved communication of the findings, but will also help ensure that the risk assessment is appropriately utilized by diverse end users.

The executive summary should also place the estimates of risk in context/perspective with other risks familiar to the target audience. Due care must be taken in making risk comparisons. Agencies might want to consult the risk communication literature when considering appropriate comparisons. Although the risk assessor has considerable latitude in making risk comparisons, the fundamental point is that risk should be placed in a context that is useful and relevant for the intended audience.²⁹

Indeed, given the almost total lack of risk awareness and literacy among the general public -- including practically all elected officials -- risk education, presentation, and communication must be extremely effective.

Thank you.

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