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FOR YOUR INFORMATION

Consumer Labeling Initiative

BACKGROUND:

The Environmental Protection Agency undertook the Consumer Labeling Initiative (CLI), published in the Federal Register (61 FR 12011, March 22, 1996), to foster pollution prevention, empower consumer choice, and improve consumer understanding of safe use, environmental, and health information on household consumer product labels. The CLI is a multi-phased pilot project focusing on indoor insecticides, outdoor pesticides, and household hard surface cleaners (i.e. floor and basin, tub and tile), some of which are registered antimicrobials/disinfectants. CLI efforts are aimed at achieving the goal by conducting research and gathering information so that EPA and our project Partners may learn how to provide consumers with clear information on product labels. This, in turn, will enable consumers to be better able to make informed choices among products based on their own needs and values, and to use chosen products safely as directed.

The CLI project is noteworthy as a model for cooperative effort between EPA and a wide range of interested parties, including local, state, and Federal agencies, consumer product manufacturers, trade associations, public interest groups, health and safety professionals, market research experts, and individual citizens.

RESEARCH PROCESS:

The first phase of the project, which ended on September 30, 1996, had three components: qualitative consumer research, a literature review of relevant publications and reports of studies available in the public domain or provided by various parties, and a review of extensive comments solicited through the FR notice. The qualitative component of the research plan included 135 in-depth one-on-one interviews with users of products in each of the focus categories in five major cities across the U.S. The results of the Phase I research were presented in the Phase I report, dated September 1996 (#EPA-700-R-96-001).

Phase II of the research, begun and directed by the Agency's industry partners in 1997, will consist of a statistically valid quantitative survey developed to test some of the learnings from Phase I, to explore alternatives to some existing label language, and to establish a baseline of

current consumer behavior with and reactions to labels. Results from over 12,000 consumers will be analyzed and used to initiate additional consumer label changes wherever possible. Also in Phase II, the Agency and its partners will explore other policy issues not easily addressed by quantitative research measures, including how to meaningfully express ingredient information and how to provide consistent storage and disposal information that will be flexible enough to take different local recycling and waste management programs into account.

PHASE I RESEARCH FINDINGS, NEXT STEPS AND RECOMMENDATIONS:

The Phase I research findings were categorized into one of three areas: 1) labeling issues not requiring further validation; 2) labeling issues requiring further development or statistical validation; and, 3) education, policy planning, and coordination issues.

Recommendations for Interim Label Improvement Measures:

Based directly on the findings and information presented in Phase I of the CLI, the *Report* recommended that the Office of Pesticide Programs (OPP) consider three areas as an immediate starting point for label improvement: 1) broader use of common names for active ingredients in addition to chemical names; 2) use of the heading “first aid” instead of “statements of practical treatment”; and 3) inclusion on labels of phone numbers for general or emergency information. OPP is taking steps right now to improve information on labels in these three areas.

Quantitative and Secondary Research Recommendations

The *Report* recommended the next phase of the CLI include a quantitative assessment of consumer comprehension, attitudes, behavior, and satisfaction regarding labeling and an evaluation of labeling alternatives. A subsequent literature review was recommended to explore more detailed existing information in specific topic areas to be examined during the quantitative phase of research. This research would result in comprehensive and specific recommendations for: 1) label design and content improvements, 2) regulatory or policy changes needed to allow improvements, and 3) additional research to further clarify issues or to test alternative labeling. Although the Agency has not required this research, its industry partners have elected to undertake the work, using the same cooperative research development process employed by the Agency in the Phase I research design.

Recommendations for Education Activities:

The *Phase I Report* called for the formation of a Product Label Consumer Education Task Force. The task force, comprised of staff from Federal, state, and local government agencies and interested CLI Stakeholders, would recommend and implement consumer education activities that emphasize the importance of reading the label.

Policy Planning and Coordination Activities:

The *Report* recommended forming several groups to examine all factors, such as scientific, business, legal, and right-to-know, as they apply to ingredients and health and safety information, as well as storage and disposal instructions. Once EPA has the consumer perspective in hand, it could make sound policy decisions based on all relevant factors. The *Report* also recommended work continue on the following: labeling policy coordination and development with other agencies at the Federal, State and international level; CLI research process expansion to other EPA policy work; recognizing the difference between consumers' label needs and the label needs of the agricultural sector and taking steps now to explore how to eliminate policy or regulatory barriers to address this difference. The *Report* also recommended that EPA should consider if it is possible to somehow standardize messages on product labels beyond pesticides; e.g., format, elements of the message.

For Further Information:

Additional information may be obtained from the CLI website at:

<http://www.epa.gov/opptintr/labeling>

or by contacting one of the CLI team members at 703-308-9069 or 202-260-7768.