

RECOMMENDATIONS FOR PUBLIC AFFAIRS PROGRAM
FOR SPI'S VINYL CHLORIDE COMMITTEE
PHASE I: PREPARATION FOR OSHA HEARINGS

I. Background

Beginning on June 25 and continuing, most probably, for the remainder of that week, the Occupational Safety and Health Administration will hold public hearings on the subject of a permanent occupational standard for exposure to vinyl chloride monomer. The National Institute of Occupational Safety and Health (NIOSH) and OSHA have both recommended a "no detectable level" standard. It is to be anticipated that this position will be strongly supported at the hearings by organized labor, some segments of the medical community, and by various consumer and environmentalist groups. It is further to be anticipated that an active public relations program will be undertaken by organized labor and its supporters prior to and during the course of the hearings to elicit public and perhaps governmental support for their position.

The Society of the Plastics Industry, on the other hand, has, through its VCM and PVC Producers Group, adopted a position which, while approving of a stepped reduction in exposure over current permissible levels, does not meet the recommendations of NIOSH and OSHA, and hence of organized labor. For this reason, the anticipated active public relations program of organized labor and its supporters will most probably be directed not only in support of its own position but also against that of SPI and the individual companies involved.

II. SPI Position

~~The details of the SPI position to be presented at the hearings are set forth in the forthcoming OSHA Committee Position Paper.~~ The essential elements of this position, which must serve as the basis for any SPI public affairs

program, can be summarized as follows:

1. PVC products play an important role in our society. Unnecessarily strict standards would deprive the nation of many valuable and beneficial products.
2. Should PVC be eliminated, the economic and social hardship in terms of lost production and lost jobs would be severe.
3. It is technically infeasible to reduce occupational levels to those recommended by OSHA and NIOSH.
4. It has not been demonstrated that a health hazard exists at the levels recommended by SPI.

While it might appear that point No. 4 is the most important one of all, it should also be remembered that the corollary to this statement is that it has not been scientifically demonstrated that the SPI recommended levels are truly safe.

III. General Recommendations

It is recommended, therefore, that the SPI adopt both a "positive" and a "defensive" public affairs strategy with regard to the OSHA hearings. The "positive" strategy would involve efforts to disseminate and make available information emphasizing points Nos. 1-3 above, with special stress to be placed on the economic and technical feasibility questions.

The "defensive" strategy would center on anticipating, following carefully and attempting to counter, to the extent feasible, the anticipated active public affairs program of organized labor and its supporters.

In both strategies, the industry's sense of responsibility and obligation to the health of its workers must always be stressed, even though the available medical evidence is not sufficient to provide a definitive answer on the question of ultimate safety.

IV. Specific Recommendations -- "Positive" Strategy

The present situation facing the vinyl chloride industry is not normal in the sense that standard public relations attitudes do not apply. The current situation should be viewed as one possibly involving the very existence of the industry. SPI should, in this instance, be less concerned with the "public image" of the industry than with the ultimate resolution of the problem; i. e., assuring that the final standards will permit the continued existence of the vinyl chloride industry. For example, while under normal circumstances SPI might properly avoid wide dissemination of the A. D. Little data because of the lives vs. dollars issue, in this situation SPI should be willing to take the possible heat of adverse public opinion in order to fully utilize the enormous potential of the Little data.

It should also be pointed out that SPI, by its adoption of a numerical standard contrary to that recommended by NIOSH, OSHA and organized labor, may be unjustly branded as irresponsible and unconcerned over the health of its workmen. It has, therefore, already accepted an essentially "negative image" position in one area of this problem because it felt that such a position was essential to its survival. To react differently with regard to the full exploitation of the Little data would not only be inconsistent, but might jeopardize the all-important end result. / /

With these thoughts in mind, the following "positive" strategy program is recommended:

1. ~~FA~~ background paper should be prepared for use prior to the start of the hearing, describing in some detail the wide range of valuable and beneficial products made from PVC and their contribution to and place in our society. The economic issue would not be raised directly in this paper nor would any tie-in be attempted to the current OSHA situation. It would serve simply as a reference piece for reporters who have written on the subject or who will be covering the hearings. A possible distribution to key government officials in conjunction with the A. D. Little report should also be considered.
2. Depending upon the completion date of the A. D. Little study, efforts should be made as rapidly as possible to place the results in the hands of key government administrative and legislative officials, labor leaders and, via hand delivery by Hill and Knowlton staff members, to selected members of the press. A general press release on the findings should also be issued late the week before the hearings begin (probably on or about Thursday, June 20) in an attempt to defuse any possible pre-hearing theatrics by organized labor. For example, the day the asbestos hearings started in 1972, organized labor in conjunction with the Mount Sinai group held a press conference for which an individual with an incurable asbestos-related cancer was brought to Washington in an attempt to elicit press sympathy. Were the same thing to happen vis-a-vis vinyl chloride, any efforts by SPI to gain extensive coverage of the Little data after such an emotional event would appear to be a response

to the organized labor press conference. The effect might be to partially defuse the impact of the Little data. It is essential, therefore, that the data be released prior to any possible last minute public relations move by organized labor. This would force labor to react defensively rather than the industry.

3. When the final SPI position on the standards is completed, a summarized version should be prepared for release immediately following its introduction in testimony. Since the current SPI intention is to have multiple witnesses, such a summary report of the key points covered would probably be most valuable to the press. The technical infeasibility of the standard would be stressed. Of course, full copies of all presentations should be available for those who desire them. A one or two page biographical sheet covering all SPI witnesses should also be prepared.

Any company with a witness testifying on behalf of SPI wishes to issue a press release on that individual's presentation, it may do so. However, the release should be issued under an SPI letterhead.

Press releases on testimony by company witnesses made on behalf of that company or as part of an overall corporate presentation should not be issued under an SPI letterhead.

4. (See attachment for Government Relations Program)

V. Specific Recommendations -- "Defensive" Strategy

While some of the following might appear to be "positive" rather than "defensive" steps, all are intended to cover eventualities beyond SPI's control during the course of the hearings and are hence "defensive" in nature.

1. H&K will attempt to obtain a witness list prior to the start of the hearings so that SPI will know, in advance, the extent of anti-VC testimony which could be expected. It should be understood that, if past experiences are any indication, additional witnesses will be added at the last minute (despite the Federal Register announcement), and many witnesses will ask that their time slot on any pre-hearing witness agenda be changed. Such requests are usually honored to the extent possible.
2. A devil's advocate session, conducted by Keiler & Heckman and by H&H and Knowlton, should be held for all SPI witnesses. If a list of potential questions is prepared, these should be made available to all members of the VCM-PVC Producers Group who are planning to testify.
3. An SPI vinyl chloride "information center" should be set up in Washington for the hearings. While there are many obvious advantages to be gained from having the center located in H&K's Washington office, a suite in a hotel located reasonably close to the H&K offices would be preferable. The main reason for this recommendation is that reporters might feel more comfortable coming to such a suite either to pick up transcripts, press releases, etc., or to interview industry witnesses whom SPI would attempt to make available. The suite could also serve as a central rallying point for the industry during the hearings and would

be open both day and night (Johns-Manville provided the services of such a suite during the asbestos hearings in 1972 and it proved quite successful).

Secretarial and other services should be available (the proximity to the H&K offices would provide for rapid Xeroxing of revised presentations, etc.). All testifying companies should be encouraged to make available for the center copies of any presentations or press releases which they might develop. In addition, a representative of SPI or the producers group should always be available to answer reporters' queries. An assignment roster should be prepared to insure such availability.

Information as to the existence of the center should be made available to the press prior to the start of the hearings and should be repeated on all SPI releases and testimony. The center should remain accessible to the press, at least by phone (its location could be shifted to H&K's Washington office) for a period following the completion of the hearings.

4. Since ~~Gene~~ DePoris of CBS-TV has already announced his intention of filming at least part of one day's hearing, and since radio and television coverage of the hearings is likely to be intense, SPI should designate one individual to act as spokesman for the entire team on any radio or television interviews. Since Dr. Selikoff and organized labor are quite likely to encourage and actively solicit media time to present their views, the industry should be ready and willing to do the same. A set of guidelines for the designated spokesman should be prepared prior to the hearings.

5. As a contingency move, Hill and Knowlton will be prepared on short notice to organize and hold a press conference should one become necessary because of an unanticipated adverse turn of events at the hearings.
6. In past hearings of this nature, industry representatives have been reluctant to cross-examine organized labor witnesses or their supporters. On the other hand, labor questioners have often viciously attacked industry spokesmen on the stand. SPI should seriously consider putting together a team of cross-examiners who would question witnesses who either misstate facts about the problem or who engage in wild flights of fancy in their testimony. The press will only report what it hears, and if industry witnesses are continuously attacked while labor representatives go unchallenged, the resultant publicity can only go one way.
7. Following each day's hearing, a press release should be prepared for immediate distribution summarizing the events of the day and the important issues raised and discussed. The release should also be sent to the member companies of the VCM-PVC Producers Group and to the 300 names on the plastics trade publication list.

VI Conclusion

While the final decision by OSHA on vinyl chloride will primarily be based on the substantive evidence presented at the hearings, a properly executed public affairs program can, if nothing else, defuse much of the inflammatory efforts of organized labor and its supporters to becloud the medical-technical-economic aspects of the issue and reduce it to an emotional battle which the Industry cannot hope to win.

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The foregoing recommendations are concerned solely with the industry strategy leading up to, and during, the OSHA hearings, since this is obviously of the highest priority.

However, an equally serious potential problem could be the development among the consuming public of a crisis reaction regarding the possibility of danger from PVC products in the home -- and even, by implication, from all plastics consumer products.

Public attitudes, and press treatment of PVC product safety, should be closely monitored and carefully gauged during the course of the hearings. Should such negative attitudes appear to be developing, it will obviously be necessary to develop plans immediately for appropriate industry action.

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