

Panel Presentation

Chuck Elkins

November 13, 2012

IRIS Public Stakeholder Meeting



My Background

- ❖ Played major role in creation of EPA.
- ❖ Over next 25 years, managed key EPA programs (Air Pollution, TSCA, Pesticides, Radiation) that used IRIS and also developed their own assessments.
- ❖ Then, for 17 years, environmental consultant working with industry on IRIS and other matters.
- ❖ Speaking here on own behalf.



I believe IRIS Is Broken

- ❖ My talk at GW Regulatory Studies Center's April conference:
 - Laid out problems with IRIS Program, but said:
If the IRIS staff take the initiative to fix their own problems [instead of having to have the NAS, OMB or the Congress do it for them]...I for one will support them from Day One, and I hope you will also.
- ❖ It's time for me to make good on my promise.



Engagement

❖ What does Engagement mean?

- Not just listening
- More like a conversation
 - Asking questions, giving feedback
- Is **NOT** agreeing with everything said
 - In fact, it's the opposite
 - Narrowing down the issues on which they don't agree.
- If done well, will bring real efficiency to IRIS program.



Engagement is not a Negotiation

- ❖ EPA is the decision maker.
 - IRIS assessments are not up for a vote among stakeholders

- ❖ Question: If EPA already has the authority to decide, why bother to engage?
- ❖ Answer: Engagement is essential to good decision making.



Stakeholders and 20 million Mississippi Chickens



Trust

- ❖ IRIS decisions are like Supreme Court Decisions
 - They need not only to be correct, but also trusted.
- ❖ Even Federal officials are not always viewed as trustworthy.
- ❖ There is also deep distrust between groups of IRIS stakeholders.
- ❖ This level of distrust is poisonous and threatens the program.
- ❖ However, more engagement means that there will be more conversations between EPA and stakeholders.



Trust, but Verify

- ❖ Ronald Reagan’s “Trust, but Verify” worked with the Russians so it ought to work here!
- ❖ EPA should:
 - conduct the program in a fishbowl
 - put verification systems in place
 - A full docket for each assessment (Regulation.gov)
 - Docket each meeting
 - Make audio recordings of them?



Conclusions

- ❖ IRIS is a good program, but it needs to get better.
- ❖ Lack of engagement has shackled the program in the past.
- ❖ Lack of trust threatens to undermine the program in the future.
- ❖ These problems **CAN BE FIXED.**
- ❖ If they are fixed, other improvements in the program can develop naturally and with the full engagement of everyone..

