PFAS Communication, Engagement and Information Sharing Guidelines

New Zealand Government

Contents

Purpose

The PFAS Communication, Engagement and Information Sharing Guidelines (Guidelines) are part of the All of Government PFAS response programme, providing advice for central and local government agencies involved in responding to per- and poly- fluoroalkyl substances (PFAS) contamination.

PFOS, one of the more than 3,000 compounds in the PFAS family, has been classified by the United National Environment Programme as a persistent organic pollutant (POP). It is likely that another PFAS compound, PFOA, will be similarly classified once it has been fully assessed. New Zealand is adopting a cautious health-first approach to PFAS substances, largely because of their bio-accumulative properties – they are only removed slowly from our bodies and build up over time.

Communicating clearly and consistently will greatly increase community understanding of the issues. This, in turn, will allow agencies to continue the important work of determining the most appropriate PFAS management and responses, commensurate with risks identified through detailed assessment and analysis of all available information.

The Guidelines provide agencies with practical guidance to help ensure that central and local government agencies are consulting with one another and collaborating as issues arise, and that communication efforts are appropriate, transparent, consistent, and easily understood by all stakeholders.

Information sharing

For the purpose of this document, information sharing refers to communication between all entities with responsibilities relating to PFAS contamination at Crown sites, as distinct from communication and engagement, which is more focused on providing information to local communities and the wider public.

Information sharing goals

Goals for information sharing in relation to PFAS contamination include:

- All the relevant bodies are aware of the issue and can contribute to the risk management plan

- Those with regulatory responsibilities have all the data they need to make timely, informed, risk-appropriate decisions

- Those with responsibility for communications and engagement have all the information they need to provide timely, clear and consistent public messages that give the community confidence that government is responding appropriately and being open and transparent

- All relevant entities are kept up-to-date as new information emerges.

Why is sharing information important?

New Zealanders expect central and local government agencies to deliver services and information consistently and openly. They also expect that, behind the scenes, all agencies of government are working together for the benefit of the communities they serve.

Effective information sharing practices between agencies will help build trust and reduce confusion and anxiety in communities.

Effective information sharing

Effective information sharing between all levels of government requires a commitment to openness and collaboration.

Timing of communications will vary depending on the circumstances. However, agencies should seek to:

- Inform and consult with other relevant entities before any community engagement is planned

- Update other jurisdictions on matters such as policy development and directions

- Make information sharing a core element of any contamination response effort.

Note: Information sharing should always be undertaken with due consideration given to any legal limitations such as commercial-in-confidence requirements or privacy legislation, and the maintenance of privilege regarding legal advice.

For more detail, please refer to the **Roles & Responsibilities document** (insert link once R&R doc completed) that is also part of the All of Government's toolbox of resources.

Communication and engagement

Communication and engagement goals

Our communications should enable local communities and the wider public to feel confident that:

- Government agencies are clearly focused on their wellbeing

- They have all the available information relevant to them, provided in a timely manner and in a way they can easily understand

- They are being heard by government and their concerns are acknowledged and understood

- In dealing with them, governments are being transparent and honest and acting with integrity

- They understand what is happening in their area in relation to PFAS and how it may or may not affect them, as well as what steps they can take to manage this for themselves (eg. reducing exposure)

- Their concerns are being addressed by government agencies that are working together and taking action

- They will be kept informed of any significant developments in government policies and activities.

Principles for effective PFAS communication and engagement

Good communication and engagement aims to provide factual and accurate information in a timely manner, and to minimise the risk of confusion, anxiety and mistrust of the messenger.

Applying the following six principles of good communication should ensure clear, factual information that effectively reaches and resonates with communities:

1. Proactive is better than reactive

2. Know your purpose

3. Know your audience

4. Communicate clearly, openly and consistently

5. Never underestimate the value of face-to-face communication

6. Learn from experience

Principle 1 – Proactive is better than reactive

- Wherever possible, be the first and most credible provider of factual information.

- Being proactive in releasing clear and factual information, as soon as any significant new development occurs, is good practice because:

    - It demonstrates government openness and transparency, which engenders trust

    - It avoids the perception that government is trying to conceal issues from the public, or shirk responsibility

    - It provides the media with facts (from credible spokespeople) and a balanced narrative they can publish

- Factual information may, in some cases, debunk myths and extinguish interest in the story before it gains momentum and causes unnecessary concern.

Principle 2 – Know your purpose

- Always establish a clear reason for communicating – identify the purpose of the communication activities before taking any further steps.

- Determining the intended outcomes of the activity will help to work out how it should be approached. It will also help to assess whether communication is helpful at this time.

- Reasons for communicating could include:

    - Transparency – eg, advising a community that PFAS-containing fire-fighting foams were used at a nearby site, and testing is about to commence

    - New information – eg, investigation results, new research published

    - Incident management – eg, unusually high levels of PFAS detected in a community's water supply

    - Information gathering – eg, local knowledge about site history, local water/food sources.

- A list of different types of communication and engagement activities, and examples of where they may be most effective, is at **Attachment 2**.

Principle 3 – Know your audience

- Understanding the community - their concerns, interests and background - will help to ensure the type of engagement meets the community's needs.

- Recognise that there might be different sub-groups within the community, with differing interests and concerns. A better outcome will be achieved if these groups are addressed separately wherever possible. This means agencies can answer each group's specific questions and ensure they leave with a good understanding of the facts pertaining to their concerns.

- Local knowledge is essential for understanding audiences, so consider meeting with individuals and groups who represent the community and can outline relevant background and concerns.

- Acknowledging the distinction between primary stakeholders, secondary stakeholders and influencers will help in tailoring the engagement and messaging to meet the information and emotional needs of stakeholders.

Principle 4 – Communicate clearly, openly and consistently

- PFAS contamination is a complex issue and much of the scientific information can easily be misunderstood.

- If people affected by PFAS contamination cannot understand what government agencies are saying, they are more likely to view the information with scepticism or as a deliberate attempt to disguise the facts.

- Know your audience (Principle 3), tailor communication to suit audience needs, and make sure the information is easy to understand.

- Be open about what is and is not known at this point in time and, most importantly, why.

- Government agencies must understand that while each is responsible for communicating issues within its jurisdiction/portfolio, communication activity will have an impact on all the other entities with PFAS-related responsibilities. This is why consultation and information sharing across agencies is essential.

Principle 5 – Never under estimate the value of face-to-face communication

- Face-to-face communication provides people with a direct assurance that they matter and have been heard. It gives the 'messenger' the chance to be aware of and correct any misunderstandings early, and be better aware of people's concerns.

- People may not like what they are being told, but they generally appreciate the effort of reaching out and engaging in person, and the opportunity to ask questions.

- There will be situations where information is difficult to understand and has different implications for different community members. Offer people opportunities to engage with authoritative spokespeople face-to-face, to address their specific concerns and questions.

- The next section of this document, '**Identifying Stakeholders**' outlines in more detail the merits of engaging with 'influencers'. Face-to-face engagement with influencers will always be most effective.

Principle 6 – Learn from experience

It is essential that every communication and engagement activity is evaluated to assess its effectiveness and analyse the public response, including media reactions. It is also important any lessons learned are shared with relevant agencies so they can be applied to future activities and ensure more effective communications.

Identifying Stakeholders

Before undertaking any communication and engagement activity, it is important to identify the key stakeholders and develop a plan to ensure you reach them all. Grouping stakeholders will help to target engagement activities and tailor messages and materials to suit the audience.

It is not necessary to engage with all stakeholders with the same level of intensity all of the time. It is important to be strategic and clear about who you are engaging with, how you are engaging with them, and why.

For the purpose of these Guidelines, stakeholders can generally be grouped into:

- **Primary stakeholders** – those who are directly affected.

- **Secondary stakeholders** – those with a vested interest and/or the ability to lobby decision makers.

Influencers, including:

- media

- decision makers.

A comprehensive list of potential stakeholders and influencers, and reasons for engaging with them, is at **Attachment 3**.

Primary stakeholders

Primary stakeholders are generally those who will be directly affected by a situation; emotionally, physically or financially. They are the priority for communication and their needs should be at the fore when considering engagement activities. These stakeholders will include residents living within investigation sites and surrounding areas, as well as people operating businesses in these areas. In situations where agricultural, aquacultural and fisheries industries operate in the local area, the primary stakeholders may include businesses affected by reputational issues associated with being near a contaminated site, even if their produce isn't directly affected by PFAS contamination.

Secondary stakeholders

Secondary stakeholders are generally people, organisations or groups with an indirect interest in the situation. They can be very vocal and, even though they may not be directly or personally affected, they can have an impact on policy direction and responses from government.

Secondary stakeholders can include:

- peak bodies and associations

- organisations leading, coordinating and managing engagement with the community

- other government agencies

- politicians

A sound understanding of these stakeholders' intent and positions and an open dialogue with them will help ensure they have the opportunity to listen and to be heard.

Influencers

Influencers are groups, organisations, experts and professionals who influence community sentiment and can shape commentary about the issue (either negatively or positively). They are the organisations and people others turn to for commentary and advice. They may also be decision makers whose decisions will have a direct impact on the community, therefore indirectly influencing community sentiment.

Engaging directly with influencers ensures they receive accurate information and have the opportunity to digest the facts and raise questions and concerns before being approached for comment. This enables them to respond accurately and rationally when fielding questions and representing the community, rather than reacting to community outrage without being adequately informed.

The media

The media is a key influencer with a unique ability to reach a large number of people rapidly and effectively. Inconsistent and ill-informed media reporting can cause unnecessary public concern and lead to a lack of trust that can damage the reputation of government agencies.

Government agencies need a collective view of what the issues are and how and when to respond. They should respond to media enquiries related to their portfolio responsibilities. To ensure a coordinated approach, agencies should share media enquiries and responses with each other as they arise.

Agencies should maintain an awareness of media coverage and engage positively and proactively with media outlets where possible. Agencies should:

- Proactively engage with media in relation to new information and events whenever possible

- Ensure that any written information provided to media is consistent, clear and easily understood

- Use agreed messages wherever possible, to ensure consistency of messaging

- Provide usable quotes from credible spokespeople

- Monitor local, national, and social media and understand who is saying what, and why

- Be willing to quickly correct the record if appropriate.

Decision makers

Financial institutions (eg. banks), property valuers, and insurance providers are all examples of decision makers who will make assessments based on the available information that will influence perceptions and can have life-altering impacts on communities and individuals. Providing these organisations with up-to-date, accurate information and data in relation to site investigations and any other issues that could affect critical economic determinants, such as property values, may prevent disproportionate responses and adverse consequences.

Governments and agencies should work together to coordinate regular approaches to decision makers, providing relevant data and information that will support informed and balanced decisions.

Attachment 1: Background – PFAS in New Zealand

PFAS are a group of manufactured chemicals known as per- and poly-fluoroalkyl substances that have been widely used around the world since the 1950s in the manufacture of household and industrial products that resist heat, stains, grease and water. Because they are heat resistant and film forming in water, some have also been used as very effective ingredients in fire-fighting foams.

Most people living in New Zealand will have measurable levels of PFAS in their blood. While we know that PFAS can persist in humans, animals and the environment for a long time, we cannot conclusively say that PFAS exposure is harmful to human health.

Exposure to PFAS can be from a variety of sources such as food packaging, non-stick cookware and, stain protection applications for fabrics and carpets. However, people who work in or live near specific industries or locations may be exposed to higher levels than the general public. The human body gets rid of PFAS over time, so once exposure is reduced, any PFAS in the body will decrease.

Airfields have historically used aqueous firefighting foams containing PFOS (perfluorooctane sulfonate) and PFOA (perfluorooctanoic acid), both part of the PFAS group. Testing commissioned by the New Zealand Defence Force (NZDF) has found PFAS chemicals present in some groundwater near Ohakea and Woodbourne Air Bases at levels near to or above the interim drinking water guideline adopted by the Ministry of Health. Some residents have been advised not to use their groundwater bores for drinking water and have been provided with tanks.

Precautionary advice

The Ministry of Health has advised that there is no consistent evidence that exposure to PFAS harms human health. This means that some human health studies have found associations between exposure to these chemicals and health effects and others have not.

Because these chemicals persist in humans, animals and the environment, it is sensible to implement precautionary measures to minimise human exposure while researchers continue to investigate the potential effects of these substances on human health.

On this precautionary basis, communities in affected areas have been provided with tailored information about how to limit their exposure, such as to use alternative water supplies or avoid eating too much home kill.

More information about PFAS and the All of Government PFAS programme is available at www.mfe.govt.nz/pfas

Attachment 2: Communication and Engagement Activities

Engagement type	Benefits of approach	Risk of approach
Community meeting / presentation	• Provides the opportunity to deliver information to a large audience simultaneously. • Ensures everyone gets the same information and messages. • Allows the community to ask questions. • Ensures broad and common issues can be clarified on the spot. *Most useful when the information to be delivered is not contentious or highly emotive in nature.*	• Creates the opportunity for a 'media spectacle' and/or promotion of other agendas. • Can set up confrontation between speakers and audience. • Limits the number of and type of questions that can be answered. • Audience members may not be comfortable asking questions in front of the whole group.
Community walk-in session (held in a venue where central and local government representatives can be seated at subject-specific tables that community members can approach for one-to-one discussion)	• Provides a forum for targeted, personalised communication with community members. • Creates direct contact with the community and helps to build relationships that assist with future face-to-face engagement. • Provides an opportunity for communities to ask personalised questions in a non-confrontational environment. • Allows for one-on-one attention from experts. *Most useful when the information to be delivered is technical or raises questions and concerns from the community that are best addressed in detail, and in a more personalised context.*	• Can be resource intensive. • Not all community members will engage with this format.
Community representative group	• Provides the opportunity for ongoing engagement with community and interest group representatives. • Small group format allows for concerns to be thoroughly addressed and misinformation to be corrected. • Allows for in-depth explanations and open dialogue. • Helps to build trust. • Provides an opportunity to test messages, information materials and engagement styles. *Most useful as a forum for discussion and feedback between government and local communities.*	• Selection of appropriate community representatives can be difficult and create additional concerns, particularly if the wider community does not feel their views are represented well by those who put themselves forward for these roles. • Success relies on a chairperson or facilitator and representatives' commitment to work together collegially.

Engagement type	Benefits of approach	Risk of approach
Influencer briefing	• Provides the opportunity to inform, educate, provide the facts, and answer questions directly with the aim of influencing commentary and community sentiment. • These influencers can then become 'credible, trusted' communication conduits to the broader community. *Should be done first, so influencers are ready to respond when other engagement occurs.*	• Can be resource intensive. • Influencers could use briefings as an opportunity to promote other agendas (however, they are likely to do this with or without a briefing – this way they are informed).
Targeted stakeholder meeting	• Provides the opportunity to inform, educate, provide the facts specific to their issues and concerns, and answer questions. • Allows for in-depth explanations. • A targeted approach helps build positive relationships. *Should be part of any engagement approach.*	• Can be resource intensive. • Stakeholders could use briefings as an opportunity to promote other agendas (however, they are likely to do this with or without a briefing – this way they are informed).
Newsletters	• People receive factual, consistent messages. • Helps to build trust that stakeholders are being "kept in the loop". • Provides links to research, reports etc. • Informs about help lines for people to receive more information. • Provides link for community members to provide feedback, ask questions. *Effective way of keeping everyone informed, even those unable or unwilling to attend meetings.*	• One way communication. • Needs to happen regularly, can sometimes appear not much is happening.

Attachment 3: Identifying stakeholders

Stakeholder	Reason for engagement
Affected communities	• Community members need to receive timely, open and consistent information about what PFAS contamination means for them. Some people may have to change their behaviour to reduce risk of exposure. • These communities are concerned about health effects and loss of property value, and some people are experiencing anxiety and anger.
National media	• National media will shape the public conversation about PFAS. • Providing factual, timely information will help achieve balanced media coverage.
Local media	• Local media is valued by communities as a regular source of information and opinion, and often as a 'defender' of communities' interests. • Providing factual, timely information will help achieve balanced media coverage.
Iwi	• Local iwi will have concerns about health and environmental effects, especially around food gathering. • They need to receive timely, open and consistent information about what PFAS contamination means in their regions.
Health related groups	• Local GPs are trusted by community members about health issues. • Health groups need information to have informed discussions with their patients. • Media seek comment from medical professionals about health risks.
Financial bodies	• Providing financial bodies with a better understanding of the risks of PFAS contamination and the response strategies underway will help them make informed and rational decisions, based on facts.
Local agricultural groups	• Organisations in and around investigation areas need to know what the implications are for them. Some of their members may have to change their operating practices. • Engaging with these organisations could help correct misconceptions about the effect of PFAS contamination on agricultural and aquacultural industries.
Members of Parliament	• MPs' constituents may be concerned about what PFAS contamination means for them. • MPs represent the concerns of their constituents and could seek to do this via the media. • Providing information and briefings to MPs will help dispel misunderstandings and increase opportunities for a balanced narrative.
Airport operators and tenants	• Organisations in and around airports where aqueous film-forming foam (AFFF) has been used need to know what the implications are for them. Some of their members may have to change their operating practices including their use of products containing PFAS and/or they may need to take some responsibility for contamination management. • Engaging these bodies may limit confusion and inconsistency.
Peak associations	• Associations seek to represent the concerns of their members and may do so via the media. • Associations may lobby governments on behalf of their members – seeking policy responses that do not negatively impact their members or sector. • Providing information and briefings will help reduce misunderstandings and can reduce the risk of disagreements playing out in the media.

Stakeholder	Reason for engagement
Remediation industry and researchers	• Engaging with these organisations will promote open communication about remediation work and options. • The remediation industry and researchers can be an authoritative voice about remediation options and research into health effects. • Media is likely to seek comment on research and remediation options.
Licensed water providers	• Water providers are responsible for water services within a city or region, including potable and non-potable water supply, sewerage, irrigation and drainage. • Engaging with these organisations will assist them in making decisions about water supply and provide them with guidance on drinking and recreational water levels. • They can also provide assurance to the community regarding the safety of the water supply.