

Managing the Chemical Risks of Consumer Goods: Two Roles and Challenges of Civil Society Organisations

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2009-08-19

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Abstract

To manage risks in Western society is increasingly seen as a process of including the public in different deliberative and/or participatory projects. This is sometimes done via civil society organisations (CSOs) that also have a second role as gatekeepers, managing or constraining flows of knowledge and information.

This paper aims to analyse the dual role of CSOs in the management of chemical risks of consumer goods. If these CSOs represent user groups, how is this done? How is the gatekeeper role fulfilled? The discussion is anchored in theories on civil society addressing the first question, while work on risk communication and perception addresses the second. Empirically, semi-structured interviews have been conducted with CSOs and state agencies in Sweden.

Certain risks are of a character that makes widespread public participation difficult. One example is the chemical contents of consumer goods where the amount of chemicals in use, the global nature of the risks, and the lack of efficient risk assessment are factors that make it difficult to mobilise ‘ordinary citizens’ to participate. Instead, public participation is mainly ensured by CSOs, such as interest organisations or labour unions.

Nevertheless, the ‘ordinary citizens’, are the receivers of risk information concerning the chemical contents of their consumer goods from industry, authorities, NGOs, and the media. However, the public is rarely communicating back directly to industry or policy makers. Instead this communication is done through CSOs. Consequently, CSOs acts as gatekeepers of risk related communication and information to and from its members.

Hence, the CSOs’ role becomes very significant in the risk management process of the chemical content in consumer goods. They represent parts of the public in political processes and also to some extent control the information flow about chemical risks. These are two important tasks that have the power to facilitate a deliberative, political process and purposeful risk management regarding health, environment and safety.

Keywords: Chemical risk, CSO, participation, information

1 Introduction

There is no perfect way to make decisions limiting risk as they are made before the full force of the risk takes place (Nowotny, 2003). This and the fact that risks are a combination of economic, political and social factors, calls for new participative methods of governance (Valenti & Wilkins, 1995). Inclusion of the public is often done via civil society organisations (CSOs). They represent parts of the public, create awareness surrounding an issue (Hunold, 2009), act as critical mass in influencing society (Curtin, 2003) and act as gatekeepers of the information flow (Diamond, 1994) to mention a few ways.

The aim of this paper is to elucidate and analyse two of the roles above, participation of the public via CSOs and information gatekeeping in the management of chemical risks of consumer goods. Further it also aims to discuss how the public can participate in political processes (in a wide sense) via CSOs. Empirically, semi-structured interviews have been conducted with CSOs and state agencies in Sweden (please see the endnotes for a methodological discussion).ⁱ

Below is an introduction to chemical risks and the role of civil society (CS). Then follow the theoretically based analysis on participation via CSOs and information flows regarding chemical risks. Intertwined in this section are the empirical findings from the interviews. Lastly, the discussion uses the findings from the literature and interviews to present a picture of participation via CSOs and information gatekeeping by CSOs in respect of chemical risks in the context of my study.

1.1 Chemical Risks as a Manifestation of Late Modern Risks

When analysing late modern risks to health and environment, it is hard to avoid the –albeit overcited – notion of risk society. This concept was introduced by Ulrich Beck some twenty years ago (1992). It explains how the society has moved from being characterised by industrialisation to being characterised by modern complex risks. These risks are diffused in space and time, which is one of the reasons that cause, effect and accountability are so hard to assess. Chemicals and chemical compounds are examples of these later modern risks to health

and environment. The use of chemicals is not new, but the widespread and somewhat uncontrolled use of chemicals in our contemporary society manifest the risk as complex and modern.

An illustration of the problematic nature of chemicals is a phenomenon called *hormesis* – that substances that are toxic in higher doses can be beneficial in lower. This complicates determining what, and how much of the chemical, constitutes a risk. First, the concept as such is debated, where scientists do not agree on its existence. Second, most risk analyses assumes linear behaviour between cause and effect (which other cases indicate is not true). Third, the potentially positive effects are only sometimes a result of the chemical itself and could be, for example, a response by the organism to a threat. Fourth, it has been proven difficult to change peoples' and experts' perceptions of what is risky once established (Elliot, 2006). These factors can, at least to some extent, be generalised to other chemicals. As a consequence, when looking at risk we cannot use the chemical hazard of a subject, but have to look at the context, both of the chemical and of the practical usage. This makes it complicated for citizens *and* experts to assess risks.

Chemical risks involve a particular set of challenges. *The first is lack of knowledge.* Experts do not have enough knowledge of chemicals and policy makers do not know enough about the connection between the chemical industry, economic growth and issues related to health, safety and environment. Citizens, in their turn, are not always aware of the risks of the consumer goods they buy. *The second is scale,* even as the basis of the lack of knowledge, scale deserves some attention of its own since the mere amount of chemicals, preparations and consumer goods make risk management or a proper overview impossible (Kemikalieinspektionen, 2007b). Another aspect of scale is that risks are manifested globally even if created locally. *The third – which characterises all risks – is conflict of interests.* Commercial interest is sometimes prioritised over risk issues. Further, there is no such thing as *one* risk issue. Health, environment and safety do not necessarily pose the same problems for risk management. What is a risk for one individual is safe for another. Finally, chemicals are also used for a reason, and purpose chemicals are not always easily replaced; moreover, the ones they are replaced with often pose problems themselves. All this raises the issue of the role of CS with regards to chemical risks.

1.2 CS and the Call for Participation of Citizen-Consumers

The definition of CS is usually the space between the state and the private. It is the “organized social life that is voluntary, self-generating, (largely) self-supporting, autonomous from the state, and bound of legal order or set of shared rules” (Diamond, 1994, p. 5). It is supposed to be a bolsterer for citizens against the political society (Mercer, 2002). Diamond (1994) states ten functions of CS. The ones that are relevant in this context are to maintain democracy, supplement political parties, represent interests, aid pluralism and be nodes of information. These issues all have to do with governance and at least some are relevant for chemical risk management.

In this paper, various types of organisations are seen as part of CS. They are unions, interest organisations, NGOs and other organised groups. They are never based within industry or government (even if they can be dependent on them). They should act in specified groups’ interests, such as factory workers, disabled or consumers. As McCarthy and Mayer (1977) identifies, there are five criteria that should at least be roughly fulfilled. They should have 1) some resources (funding and staff), 2) some structure, 3) some involvement of outsiders, 4) both “supply and demand” of resources and 5) some cost and reward in activities.

Public engagement has an increasing impact on changing how the market is allowed to steer society despite of risk related concerns (O’Rourke, 2005; Irwin, 2006). This is often related to sustainability, and participation is highlighted as to create a changed relationship between science, experts and citizens. This is needed to restore public trust in science, to face the complexity of environmental problems, to democratise science and to provide efficiency in decision making (Bäckstrand, 2003; Rayner, 2003; De Marchi, 2003). In policy reports and public material, the need for stakeholder involvement is emphasised for taking relevant views into consideration, finding optimal solutions, increasing the technical quality, efficiency and transparency (Kemikalieinspektionen, 2007a).

According to Pellizzoni (2003), participation should include four main groups: citizens, politicians, experts and stakeholders. The three first categories can also be stakeholders, but the point is that by being a stakeholder one may make special claims to be taken into consideration. Communication is strongly underlined as a means of participation to bridge the gap between interest groups.

While it is easier to attract citizens to engage in questions of local character it is more difficult to mobilise participation on national or global level. This could be because it is easier to understand and have a point of view on something that is familiar and affects the immediate life (Pellegrini, 2008) and that people live their lives locally (Lidskog, 1994). When issues are on a larger scale they also become more institutionalized which could require more time, effort and means to participate (Sabatier & McLaughlin, 1990). According to King will “rational individuals ... tend to free ride” (2008, p. 25). This means that people are happy to see others engage but are more reluctant to do it themselves. The opposite is also true – that people become active if the question is of great enough concern for them (Curtin, 2003). Individuals might also not see themselves as influential in affecting the actions of someone else (Lidskog, 2005) and the issue of critical mass can best be achieved by CSOs (King, 2008).

1.2.1 Participation via CSO

The political and industrial sector has a tendency to delegate power to CSOs when it comes to social issues. CSOs become the voice of concern for citizens, and citizens also turn to them with questions and support in issues of risk. The outcome is that CSOs are real political actors in risk issues and often work in regulatory bodies or with lobbying. Many of these CSOs make no claim to be representative of the general public but of their own members (Curtin, 2003) or of the cause of the CSO.

States often include CSOs in the political debate to strengthen the social arena and the democratic process (Mercer, 2002). In aiming for this, the EU for example, funds CSOs. The EU also lists what they define as CSOs in a database (CONNECS), with the requirement that these organisations are representative, accountable and democratic (Curtin, 2003). CSOs then helps in creating a political system that acts responsibly; yet, CSOs are also dependent on a structure that allows them to operate in relatively autonomy.

Sometimes, though, individuals or members have little to say about the agendas of CSOs. Instead members show their support by paying (or not) their membership fees (Chandhoke, 1995). We can sometimes see a difference in beliefs or opinions between members and the

leaders of more institutionalised CSOs (Sabatier & McLaughlin, 1990). For this gap to decrease, members need to speak with power, legitimacy and urgency (King, 2008).

Even if members show dissatisfaction with for example policy or industry when it comes to chemicals and/or risk issues, there has to be structural or institutional opportunities such as law changes or a general accepting climate for CSOs to take action. Hence, CSOs make use of political ‘windows of opportunity’. Indicators of this is when systems begin to change, for example, when new legislation takes place (REACH is a good example) as in times of uncertainty we are more inclined to listen to other people. This makes the question of information flows highly important.

1.3 CSOs and Information Flows

Information flows when it comes to risk. This flow goes between different levels and types of actors. They are all likely to transform the information according to their own frameworks of processes and perceptions (Assmuth & Hildén, 2008) and these actors can be seen as gatekeepers of the information flow. The European Commission has highlighted CSOs as one of the more important gatekeepers (Leire & Thidell, 2005) as CSOs are a source of knowledge when people are looking for trustworthy information (Nelkin, 1989). The less the public trust industry the more they are likely to turn to other types of organisation where CSOs is one type (Palenchar & Heath, 2007).

Risk communication is seen as a strategic tool by mainly firms and government but is also used by CSOs (Wardman, 2008). Risk communication can, in one extreme, be seen as sending out a message to the public concerning a risk (Valenti & Wilkins, 1995) in order to decrease the difference in opinions between experts and the public (Bäckstrand, 2003). The other end of the scale includes the audience in a dialogue where the communication *per se* could be more valued than the eventual message transmitted. Even if firms often are accused of using the first type of communication strategy it is clear that so do other organisations as well (Wardman, 2008).

Motives behind risk communication can be building trust, raising awareness, educating, reaching agreement and motivating action (Bier, 2001). Others highlight alternatives means of regulation, to share power and to overcome opposition (Wardman, 2008). CSOs can have

opposite motives in wanting to create opposition, but nevertheless the challenges they face are the same as for firms or government.

Problems in risk communication is that there usually is scientific uncertainty which is seen to “confuse” people, lack of credibility depending on the communicator, problems in the message transmission and receiver differences in how the message is interpreted (Nelkin, 1989). The last is called risk perception and can be seen as how our social context and past experiences shape us in our understanding of risk (Vaughan, 1995). It means that when communicating to the audience, CSOs have to be aware of the receivers and adjust their communication accordingly (Bier, 2001). This is what we mean with framing and hence we are brought back to the beginning of this section where the framework of the CSO was underlined as a determinant of the communication. Hence, the frames of the public(s) and the framework of the CSO have to be at least mutual understandable for communication to be efficient.

2 Analysis

Below, I have, for the sake of clarity, divided the analysis into separate sections of the speciality of chemicals, participation via CSOs and the CSOs management of the information flow. However, it is clear that at times some part belongs to more than one category.

2.1 In what Ways are Chemical Risks Special?

2.1.1 Knowledge and Scale – Two Sides of the Same Coin

One would expect that it is factors influencing the knowledgebase that makes chemicals special. It is, but at the bottom line it is *the scale* of the chemical field.¹

¹ Of the 30 000 chemicals that are in use in the EU, in weights exceeding 1 000 kg per year, only 1 500 have been adequately tested for hazards and risks (www.kemi.se). This is the limit where REACH (the European chemical legislation) states that the chemicals have to be evaluated, assessed and registered and information about this passed on to down-stream users (www.kemi.se). But there are approximately 40-70 000 substances in the EU that is not covered by that legislation because of not large enough volumes.

“My main point is also that we do not see the problem with chemicals because there is no one that has the knowledge. We see the tip of an iceberg. [...] We talk about 30 000, 40 000 different substances in the European market. Maybe up to 100 000 different chemical substances that we have in even more preparations and in millions of consumer goods. The politicians are almost taken aback by the problematisation.”
(state authority 1)

A related problem is that there is very little knowledge on the quantities of each substance that actually is in use in society. The estimations that are made are often rough. New areas of use constantly emerge that makes an overview of the actual consumption of a chemical difficult (interview, state authority 1). It is clear that there cannot be a complete expertise on this subject because of the scale of it. If we also consider so-called cocktail effects² or the chemical content in consumer goods, the expertise in these matters actually know very little (interview, handicap organisation 1).

These questions highlight that the chemical risk is a matter of materiality and socio-materiality. The first relates to the physical properties of the chemicals and the second to how the risk is manifested and managed in society (Boström & Klintman, 2008). The example of *hormesis* described above is a good example of this. Below, I focus on the aspect of priority issues to show how materiality and socio-materiality are interdependent.

2.1.2 Priority Issues

One priority issue is what should be classified as SVHC:s³, and what should not. One would expect that the scientific analysis would provide that answer but since the result of this classification is political, economical and social it is not done so easily. Hence the highly interdependent nature of the materiality and socio-materiality is clear.

“One problem of very high concern is that there is a pre-assumption of what these [chemical] substances are. In the next coming few years there will be huge fights

² Effects of chemicals that occur when two or more chemical are mixed. These effects are often hard to predict and potentially more toxic than the individual chemicals.

³ Substances of very high concern

about how to classify the SVHC:s and about which substances should be classified as SVHC:s.” (lobby organisation for increased chemical safety)

The issue of the chemical content in consumer goods is a question of product safety. But product safety is often seen a risk that is immediate or that causes a significant damage which makes it easier to put demands on products. With chemicals, however, there is a gliding scale. Some people are more sensitive than others in terms of, for example, exposure and the effects of exposure could be extremely delayed. The functionality of chemicals is another reason why it is difficult to restrict the use of it. Often chemicals with high functionality also have unpleasant properties (for example cleaning agents) (interview, consumer association). Even when replacing the dangerous chemicals with something potentially less bad, it often turns out that the new chemical poses issues as well (interview, union 2). Hence there is a need to balance risk and usefulness (interview, consumer association).

Another priority issue is that of health or environment. There is no absolute relationship in that what is good for one also is good for the other. For example, consider a factory-made chemical that constitutes a high dosage, high exposure situation for the worker in the factory. Once put in the product, however, it can be in very low doses or emerge highly diluted or metabolized in nature. So this is a health issue for workers but not necessarily an environmental issue (interview, union 2). And these issues can be difficult to combine.

“We have focused a lot on the health of workers. We have also focused on the environment, but not to the same extent. Environment and chemicals, we thought we would be able to connect them, that the two issues could jointly put demands on work places. We have worked with that but it has come to a standstill.” (union 2)

2.2 How Participate Citizen/Consumers in Chemical Risk Management?

2.2.1 Political Consumerism

The state has traditionally been the one responsible for identifying the potential risks in our society. Subsequently as put by one informant

“If you would ask any consumer on the street if there are dangerous chemicals in their clothes, shoes or computers they would reply that we are a modern society and the state has taken care of that a long time ago. At the same time we have scandals over and over again. “(lobby organisation for increased chemical safety)

As a reaction to these scandals we find political consumerism (Klintman, 2009), responsibility taken by citizens (or put on citizens by media, industry or the state) to support firms or products that are seen as environmentally and/or socially friendly. The effects of this can be considerable (interview, consumer association). However, it has to be acknowledged that it is very difficult to be a political consumer in every purchasing decision.

“A very general observation is that when the consumer is about to buy such products there are many factors to consider which means that often the consumer does not get to think about the chemical content of the product.” (state authority 2)

Further, there is not necessarily a simple answer to what is the best product as this is a priority issue and as such requires knowledge. As noted above it is impossible to know everything about chemical risks, which means that this mode of pressure might not be sufficient in all cases (Miljömålsrådet, 2008) such as the industrial use of the substitution principle (Kemikalieinspektionen, 2007c). One reason is that consumers are not consistent. We are willing to spend time, money and effort on something we find important but make a lot of purchases that are not in any way reflective (interview, consumer organisation, lobby organisation for increased chemical safety).

Most interviewees believe that the public should not have to see consumption as a political activity but that we should be able to trust industry and the state.

“On the other hand it can be said that it is best if consumers do not have to learn everything. If they do not have the time, energy or capacity to do so. But that responsible parties deal with this so that consumers can trust they get a product that is made with as little environmental impact as possible.” (State authority 2)

2.2.2 Participation via CSO

The chemical industry is extremely powerful. This makes the involvement of citizens even more important, but also more difficult. Benevolent ambitions of politicians or other groups typically get diluted in the negotiation process surrounding chemical legislation (interview, consumer association). The power issue is hence extremely important in these matters, and participation of the public is arguably handled best through more institutionalised CSOs. Most informants see a general tendency of industry valuing economic interests more than risks or safety (interview, union 2). The fight in acknowledging other interests might only be possible to do by more powerful actors.

When issues are on a larger scale they become more institutionalised, for example by being placed in a legal structure within the UN or EU, and hence more complex and bureaucratic. As the procedures also become more structured it also requires more time, effort and means to participate (Sabatier & McLaughlin, 1990). These structures are not necessarily bad (even if they might make it more difficult for ordinary citizens to participate) as they can create an environment for being responsible, but they can raise questions of legitimacy (White, 2007). As one informant puts it

“... it is the countries with a good ability to organise the collective that get responsible in the chemical issues“(consumer association)

We also become more responsible when we act together than when we act alone. The collective voice has more responsibility and conscience than does the individual.

“People discuss things together and get more responsible than as separate individuals. These decisions are better made collectively than individually.” (consumer association)

By being a member of a CSO, citizens can express their concerns, interests, and be active or choose to have the CSO represent them (Curtin, 2003). Membership does not imply active participation but can be passive support where the CSO's general aim is agreed with. It can be said to constitute a belief system based on topic and scope that through organisation represent a general view of stakeholders (Weible, Sabatier, & Lubell, 2004). By ensuring a structure that facilitates a discursive process one can consider participation by citizens as a result (Curtin, 2003).

But it seems to be the local level where individual members can have the most influence (Lidskog, 1994). This idea is consistent with the suggestion presented later on in the paper,

namely that the local level is where individual members can exercise most influence. This is the arena with the apparent largest influence on the daily lives and activities of members.

“Generally it is about engaging in activities. In the local association or in the local shop council” (consumer association)

2.2.3 Challenges of the Advocacy of CSOs

One informant states two reasons why CSOs are important in influencing society. First, in Sweden people rarely approach their representative in government and second, few people are involved in party politics. Instead, citizen’s opportunity to influence is via the political process, that is through CSOs (interview, lobbying organisation for increased chemical safety, state authority 2). At the same time it is stated that often citizens are underrepresented in most instances even in the explicitly participatory bodies on EU level.

A result of this interest representation in political processes is that CSOs sometimes are assigned tasks that they do not see themselves as responsible for. One example is how a consumer organisation is given responsibility (from the state for example) for issues that they would never prioritise themselves (interview, consumer organisation) as there might be no other obvious CSO that can represent that part of the public. The effect of this is that the CSO gets a voice and influence in matters where they do not hold particular expertise and that the representation perhaps could have been better done by another CSO.

For most CSOs to be included in policy making they have to show representiveness of their members (Curtin, 2003). This can be a problem when the issues for the CSO is specialised and many CSOs do not claim to be representative of a larger public or even their members as they are issue oriented in their approach. Another consequence is that people cannot always choose what CSO to belong to as there might only be one CSO that could represent a certain type of citizen (albeit people always have the choice of membership or not) (interview, handicap organisation 1)

Most interviewees in this sample, not surprisingly, establish that their CSO are democratic.

“We are a democratic organisation. So it is the democratic way somehow. If we talk in big terms, we are a transparent organisation and democratic in that you submit a

proposal to the board [...]. In small terms members can call or e-mail me and ask what things are like. We have a discussion. Or ask us to do things in a certain way. That happens every day.” (handicap organisation 1)

The informant however then goes on to say that they do not have an explicit channel for this purpose. The same argument is used by a consumer organisation where it is stated that the way to exert influence is by getting involved. The question still remains though – who is getting involved and how does it affect the CSO?

2.3 CSOs' and the Gatekeeping of Information Flow

One of the democratic functions of CSOs is to act as a “ideological marketplace” (Diamond, 1994, p. 6) contributing to the exchange of information and ideas. Citizens need to be informed to be able to act in their own interest, and by giving information on what governments or industry is or is not doing, CSOs creates opportunities for civil engagement (Diamond, 1994). Other times, they aid in keeping up an ongoing dialogue among citizens (Curtin, 2003).

“We are supposed to interpret the daily tendencies in society and transform it into information to our members. And to be good at it.” (handicap organisation 1)

The Swedish Environmental Objectives Council states in its latest report on the Swedish environmental targets that CSOs are important in communicating actions to fulfil the targets. At least two environmental CSOs are also on board as experts in the work and hence influence the actual outcomes of the Swedish environmental work. The role of CSOs is at least dual, first, to achieve communication between groups and second, to increase citizens' awareness and communication (Miljömålsrådet, 2008).

“The information that we try to give to the citizens can sometimes be of enlightening character of how something really is or of something that we think the consumers should think about. But sometimes the information is lobbying – even directed to the individual. So, that the consumer should acknowledge, and maybe participate, in the process to create political pressure.” (consumer association)

It is clear through the interviews that information gatekeeping is an important task for the CSOs in this study. The information flow goes in several directions. First, to members and the general public where, at times, information aimed at members is used by the general public with more or less consent from the CSO (interview, handicap organisation 1). A second flow is directed towards industry where the aim is lobbying for changed behavior (interview, union 2). It can also be of an informative type where the CSO states that something has happened that the firm needs to take action against or that firms have to behave in a certain way to adhere to CSO policy. A third information flow goes to authorities that is similar to the flow directed to industry. However, the role of the receiver is different as authorities already represent the public (although many state agencies are very close to industry – maybe closer to industry than society (interview, union 2, handicap organisation 2)).

Another related issue is how CSOs work for citizens' or members' right to information (interview, consumer organisation, lobbying organisation for increased chemical safety). Hence they lobby industry in order to make them communicate with their customers. It is highlighted that the consumer has the right to information to make decisions for themselves, but that industry should not be able to safe guard themselves with information.

“I don't think that it is reasonable in every situation that the consumer will get information but that the society should function so the market inspection from authorities is so good that the consumer can trust the product. [...] But we think that if the consumer wants it, they should always have access to the full information.”
(consumer association)

CSOs also work for increased awareness surrounding labeling, claiming that the label is less important without sufficient information (interview, lobbying organisation for increased chemical safety). Considering that many labels are issued by CSOs it is then clear that the ambition often is increased information and transparency (Boström & Klintman, 2007).

At times information is used for protection. For example, unions address their members in how to protect themselves and handicap organisations inform about products suitable for their members (interview, union 1, handicap organisation 1). Members do not have much influence about what and in what way information is given (interview, union 2). It is emphasized that information might have to look different depending on who is the target group but that the information still should remain intact over the value chain (interview, state authority 1).

Information can sometimes be seen as complementary to legislation and is put in place in order to make laws more efficient and easier to follow (interview, state authority 1).

3 Discussion

This paper has tried to shed some light on two roles of CSOs in managing the chemical risks in consumer goods. It has discussed how CSOs act as a means for public participation and CSOs' role as gatekeepers of information flows. The theoretical findings have been supplemented with information from interviews with CSOs or state authorities in Sweden.

3.1 The Quantity and Scale of Chemicals Create Particular Risk Challenges

Chemical risks manifest themselves as conflicts of interest. While this is a characteristic of all modern risks, in combination with the amount of chemicals in use and with a severe lack of knowledge (which is related to the scale of it) the risk with chemicals is special. Chemical risks end up in priority issues where there are no easy – or even right – choices. Chemical risks are seen as special as a result of a complex mix of materiality and socio-materiality.

Very few of the chemicals in use have been analysed for their risk but scientific evaluation is only one part of it. The management of risk is a mixture of the risk's materiality (the properties of the chemical) and its socio-materiality (how it is managed in society). One example is how issues of safety, health and the environment cannot always be grouped together since what is good for one is not necessarily good for the other. As a complicating factor there are different legislations for them. Hence, most CSOs work in either health or environment issues, and there does not appear to be an easy solution in how to combine these.

3.2 Public Participation via CSO

The lack of safety that characterizes the chemical content in consumer goods is a result of what is special with chemicals. The industry and the state are seen as having different ambitions for the society than citizens. Political consumerism is a consequence of this but it might not be enough to trigger larger changes. First, it is difficult to be a consistent consumer and it is even considered that citizens' consumption should not have to be political. Second, the scale of the chemical issue makes it hard to manage for the individual. Third, citizens become more responsible in group and can through it also achieve a critical mass. Hence, chemical risk issues can perhaps be better resolved by CSOs. They have the knowledge, focus and resources to act in the interest of citizens. They are also part of the political system in a more institutionalized way.

As a result of this, CSOs pressure industry and government for change. CSOs can moderate a strong emphasis on economic growth that is seen within government and industry. By leaving issues of more social and environmental concerns to CSOs, and by offering new types of more inclusive risk governance, we have political opportunities for CSOs. They act as representatives of their members and in their interest in political processes. A problem could be that a CSO is there simply because there is no one else to ask. Another issue is that since CSOs are seen as a vital part of society they also get funding from it (nation states and the EU for example). It is of course then relevant to ask if acting in the interest of the members becomes more difficult by these structures.

CSOs often say that their members have influence, especially the local activists, but the CSOs examined in this paper show few explicit channels for that and rather assumes a natural democratic process. This indicates that there indeed are reasons to ask if CSOs represent their members or their concern. The answer might be that there are different types of CSOs. Some CSOs has the cause of the organisation in their focus whilst others focus on the members' interests.

3.3 Information Flows

The CSOs in this study see the roles as gatekeepers of information as one of their most important tasks. It is their responsibilities to inform their members of the activities in society at large and to do it in a format that suits them. The information is often used by the whole

society and not only the members of the CSO. Hence, the CSO needs to act responsibly towards members of society and not only their own members. At the same time CSOs are the ones communicating back to industry and the state about issues that concerns their members. How, and above all, how well this is done has not been identified in this paper but will be looked into in later work.

We can see three flows of information that CSOs manages – towards members/citizens, industry and the state. Some of these flows are purely informative while others aim at lobbying some or all the three sectors. The informative flows can bring attention to an issue or to create condition for change. Another aim of the CSOs is that they try to get industry and the state to inform customers/citizens. It is however clear that the content of the information needs to differ depending on the receiver – their frames put the conditions for the information flows.

3.4 Three Levels of Activity and Influence

As indicated in the text above there might be a qualitative difference in members. I suggest that we should divide CSOs into three distinct levels of activity and influence.

The national or international levels of CSOs are where the members should agree with the general goal and ideology. The activities, in practice though, might be closer to industry and government, as in for example working with lobbying. With an increasing distance and a higher level of institutionalization and professionalization it is reasonable to believe that the ideological and practical gap to the members widens.

The local level works with questions of immediate concern, with physically proximate members with an ambition, and maybe possibility, to influence the parent CSO. The local level would then function more like the idealised view of how a CSO should work. They aim at having a direct influence on their members' lives today as well as on the structures surrounding them that do not function in a satisfactory way (Lidskog, 1994).

The last level is the passive members that support the parent CSO but have no great interest in how things are run or maybe not even in what particular question the CSO works with (they can also be members to access information). They grant legitimacy to the CSO and give it

mandate to operate in representative processes. As such they are highly important for the CSO but are rather invisible in the activities of it.

Future work within this project aims to look closer into the two last levels by first investigating how local groups work in their daily activities, how they identify what issues to work with, what role they have in information flows and how they influence the parent CSO. Then the perspective of the passive member will be investigated. The aim is to clarify CSOs' role in chemical risk management of consumer goods in respect of the link between citizens and members and the CSO.

ⁱThe literature that this paper is based on has been found via a systematic search. First literature describing the risks with chemicals was researched to identify the most interesting theoretical parts for this paper. These were identified as public participation in risk issues – particularly through the activities of CSOs. In doing so I found literature describing the role of CS, social movements and representation. Another issue of interest was the role of information and information gatekeeping in the citizen-CSO relationship. This strand of literature was more difficult to find but the ones that was identified addresses aspects of risk communication. When possible, literature explicitly combining one of the two theoretical challenges together with questions of chemical risks has been used.

The empirical part of this paper consists of semi-structured interviews conducted in Sweden from May to December 2008. Ten interviews have been conducted as a pilot study; consumer association with a general focus, handicap organisation 1 and handicap organisation 2 with a chemical focus, labour union 1 (umbrella organisation), labour union 2 (industrial focus), lobby organisation for increased chemical safety, state authority 1 with chemical focus, state authority 2 and state authority 3 with consumer focus and state authority 4 with work environment focus. All organisations apart from the state authorities are NGOs. In this paper the interviews from state agencies are used to complement the views from the CSOs.

The questions asked were designed to investigate how the CSOs' members influence the mother CSO and what the information flows look like. They were asked what role the CSO had in the management of chemical risks in consumer goods, and how they work with other actors. These questions brought into light the issue of consumer power, responsibility, influence and the ambiguity of the concept of risk. Further they highlighted the complexity of information transmission, understanding and use as well as an issue of trust that ties all these aspects together.

During the interviews, notes were taken and they were recorded. The recordings were subsequently transcribed. The material was analysed and thematically categorised. The material has been used both for reference and as direct quotes. The quotes were translated from Swedish to English and have been edited for style and clarity, however not for content. They are nevertheless presented as statements from the informants.

It should be mentioned that the sample is strategic. It is a first attempt to operationalise the research questions. The interviewees were selected to present relevant perspectives on the issue and in order to include different citizen groups. Hence the interviewees' opinions presented in this paper are not a general view of CSOs in Sweden.

However, the interviews can be seen as valid in the sense that they well managed to confirm each other. In large parts, the same picture was presented and in the cases where it was not it was expected. For example could we see handicap organisations or unions representing views closer to CS and state authorities closer to industry. In these cases informants might not support each other's opinions but the contradictions are awaited and it would be more curious if they were not there.

There is considerable strength in the material as it provides insight and opinions from different types of actors of CS and the state. It is possible to see how they work together and where they have different roles. The empirical material shows that the CSOs investigated have an important role and can build a new understanding for the role of CSOs in Sweden when it comes to chemical risks in consumer goods.

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