

Communicating PFAS phase-out

A stakeholder engagement toolkit

This toolkit was developed by the Internal Communication Task Force within the Danish EPA's PFAS Partnership with Industry. It provides practical tools to help companies build consistent, well-founded PFAS communication and develop targeted engagement strategies based on stakeholder mapping.

The toolkit comprises three sections:

1. Stakeholder mapping
2. Messaging and narratives
3. Engagement strategies

1. Stakeholder mapping

Purpose: To identify, prioritise and analyse your internal stakeholders and gain clarity on who is most critical to involve in the PFAS phase-out efforts and insights on their level of knowledge and their attitudes towards PFAS.

The task has 3 steps:

1. Identify the relevant internal stakeholders
2. Prioritise the stakeholders based on their influence and interest
3. Analyse the stakeholders' knowledge and motivation

1. Identify relevant internal stakeholders

Task: Make a list of the internal stakeholders (functions and/or named individuals) that can influence or will be influenced by the PFAS phase-out. It could be functions/individuals with decision-making authority or knowledge about materials, products, production processes and suppliers. It could also be employees who work with products or processes where PFAS are used.

Typical internal stakeholders would be:

- Top management
- Purchasing / sourcing
- Product development / process design
- Production / operations
- Quality / compliance
- Environment, health and safety
- Legal / risk management
- Sales / marketing
- HR

2. Prioritise stakeholders based on influence and interest

Task: Use the Power-Interest matrix to analyse and prioritise the stakeholders based on their influence and interest in the PFAS phase-out efforts.

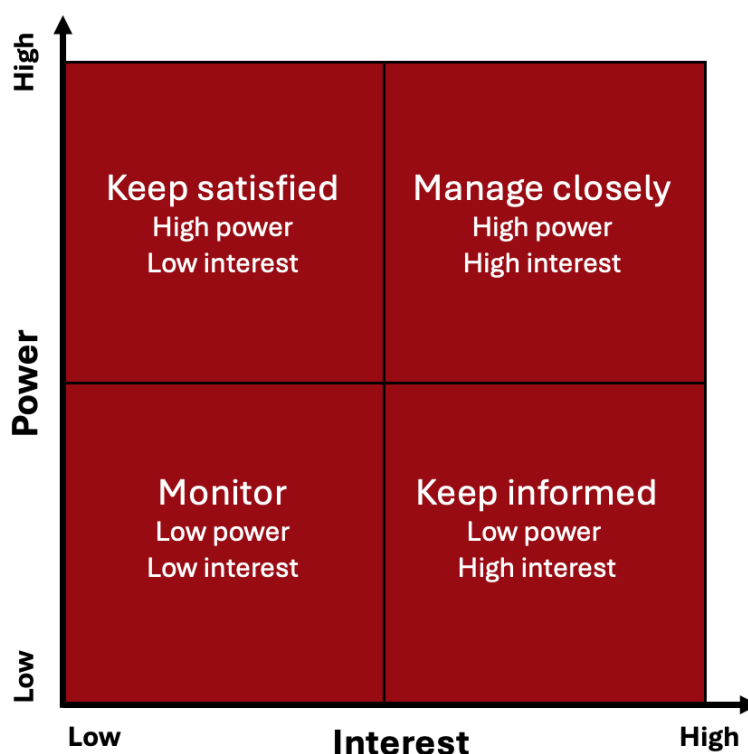
The sliding scale on the x-axis refers to the amount of power each stakeholder has:

- Can the stakeholder make or block decisions about the PFAS phase-out?
- Does the stakeholder possess critical knowledge on materials, products or processes?

The sliding scale on the y-axis refers to the level of interest they have in the outcome:

- Will changes in materials, products or processes due to PFAS phase-out affect the stakeholder?
- Does the stakeholder bear risk if the phase-out fails (compliance, quality, economics)?

Place each of your listed individuals or stakeholder groups in one of four categories in the matrix:



The recommended prioritisation of engagement would be:

1. **High power / High interest:** These stakeholders are the most critical and key players. Therefore, they will demand the highest priority in terms of communication and involvement in decision-making and/or development of alternative solutions.
2. **Low power / High interest:** These stakeholders are often important for implementation of new solutions, so they should be regularly updated on progress and involved/consulted when needed.
3. **High power / Low interest:** These stakeholders are often underestimated, but they can be critical if they are not satisfied, so it might be important to keep them in the loop on decisions.
4. **Low power / Low interest:** These stakeholders typically require minimal attention but should at least be monitored and informed of important decisions.

3. Analyse stakeholders' knowledge and motivation

Task: For each of the prioritised individuals or stakeholder groups, analyse their level of knowledge of PFAS as well as their concerns and incentives for engaging in PFAS phase-out. This might require short individual or group interviews with some of the stakeholders.

Knowledge: What level of knowledge does the stakeholder possess:

- Specific knowledge on PFAS in products or production processes?
- General chemical, technical or environmental skills?
- Experiences with substitution of restricted chemicals?
- Any other relevant knowledge/experience?

Concerns: What are the stakeholder's main concerns and perceived risks:

- Uncertainty about legislation?
- Increased costs?
- High level of complexity?
- Lack of time, resources and/or support?
- Lack of documentation for alternatives to PFAS?
- Risk of performance/quality loss?
- Fear of liability or extra work?
- Lack of market interest?
- Uncertainty about suppliers and delivery capacity?
- Other concerns?

Incentives: What would be incentives and key success criteria for the stakeholder:

- Clear strategic position on PFAS phase-out?
- Clear business case on alternatives?
- Overview of risks, schedule and costs?
- Resources for development and tests?
- Break down phase-out into manageable pilots /milestones?
- Customer requirements?
- Test data documenting functionality / quality of alternatives?
- Approved PFAS-free suppliers, contract terms and audit strategy?
- Other incentives?

Note the outcome of the analysis in the table below.

Outcome of stakeholder mapping

Stakeholder	Power/Interest	Knowledge	Concerns	Incentives
Top management	High power/High interest: Strategic decisions and allocation of resources	Limited knowledge about PFAS and alternatives	Uncertainty about legislation, high level of complexity and increased costs	Clear business case on alternatives and overview of risks, schedule and costs

2. Messaging and narratives

Purpose: To clarify your reasoning, sharpen your key messages, and adapt your communication to the concerns and priorities of different stakeholders.

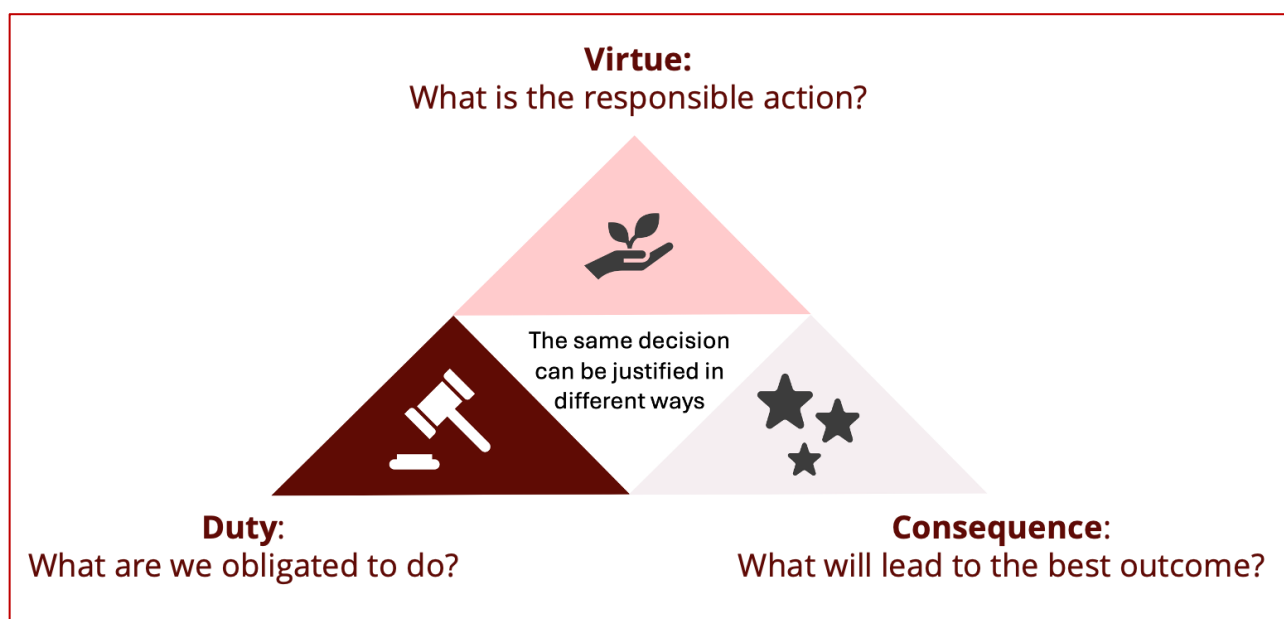
The task has 3 steps:

1. Establish the framework of arguments
2. Prioritise and organise the key messages
3. Build the narratives

1. Establish the framework of arguments

Task: Identify and formulate the key arguments for PFAS phase-out using the three types of arguments: virtue, duty and consequence.

From risk management and rising costs to environmental and social responsibility, the reasons for phasing out PFAS are numerous and interconnected. Given this complexity, the first step is to establish a clear, simple framework for the arguments that will anchor your communication.



Virtue arguments are about inherent values: What kind of company are we?

PFAS phase-out is justified with responsibility, decency, and integrity: We do it because a responsible company does not close its eyes to a known risk to people and the environment, but does what is right as a matter of principle.




Duty arguments are about obligations: What are we required to live up to?

PFAS phase-out is justified with legal requirements, best practice standards, policies, and obligations: We do it because regulation, customer requirements, and our own governance demand that we ensure compliance and license to operate.

Consequence arguments are about outcomes: What creates the most value for us?

PFAS phase-out is justified with risk mitigation and business logic: We do it because early action reduces risk, protects operations and market access, and can strengthen our competitiveness.

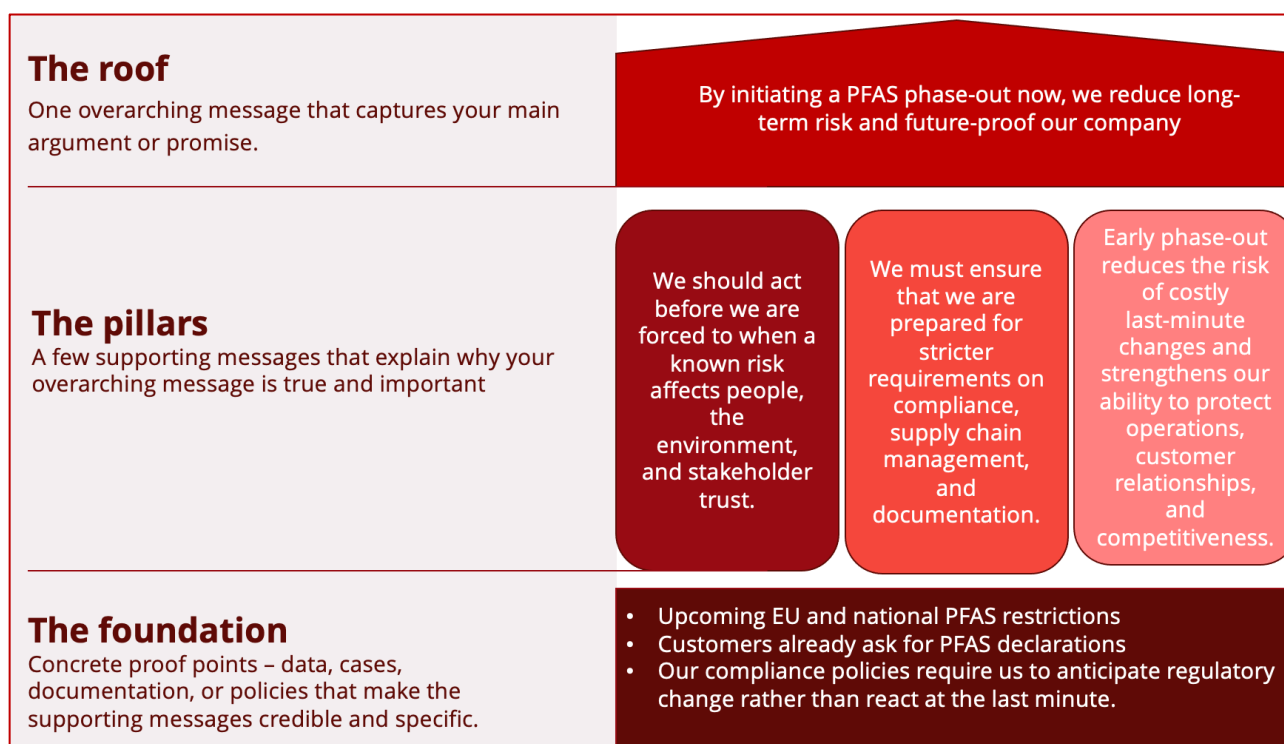
While all three types of arguments are broadly applicable, their impact depends on the target group, and strategic messaging requires prioritising the one or two arguments that resonate most deeply with the target group. The table below suggests which arguments to emphasise when addressing different internal stakeholders.

Argument	Focus	Typical target groups
Virtue 	Corporate values, integrity, responsibility, trust.	Environment, Health & Safety, Sales & Marketing, HR, Production & Operations
Duty 	Compliance, legitimacy, documentation.	Legal, Compliance, Purchasing & Sourcing
Consequence 	Results, risk reduction, business value.	Top management, Risk management, Product development

2. Prioritise and organise the key messages

Task: Prioritise and organise your different types of arguments into a clear hierarchy of messages for each stakeholder group using the message house model.

The message house is a simple visual way to structure your key messages, so they are clear and consistent. The message house can serve as a shared reference for everyone communicating about PFAS across all platforms.

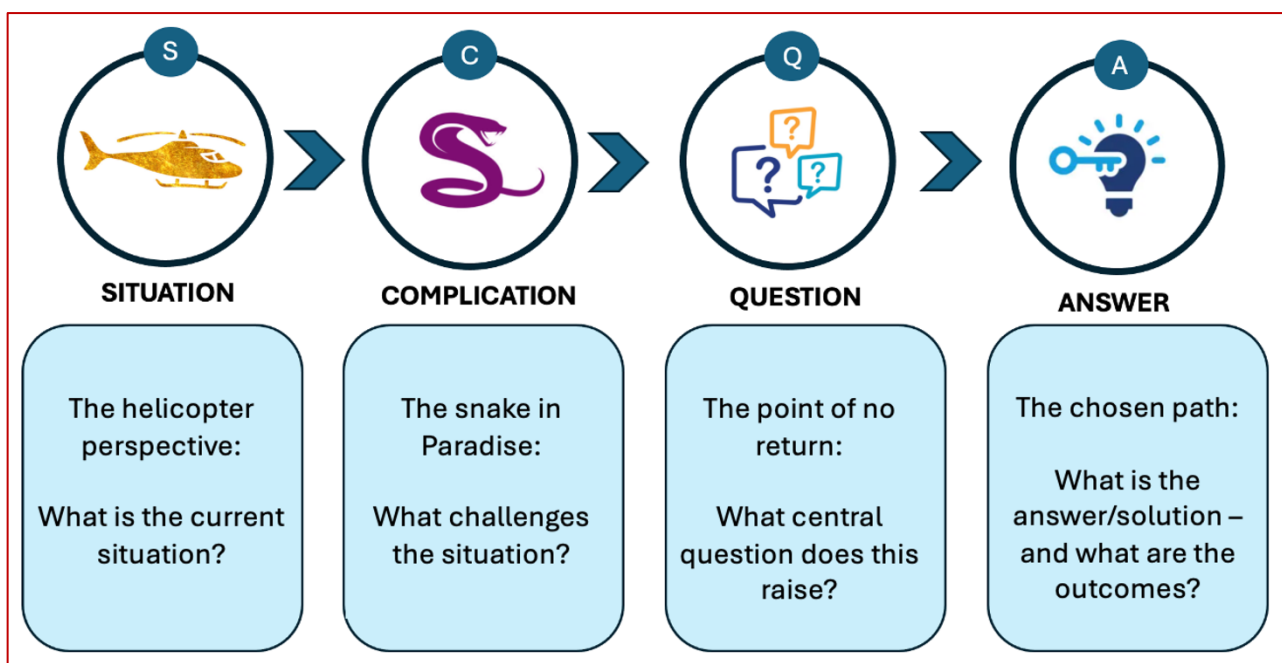


3. Build the narratives

Task: Apply the SCQA model to transform your key messages into a clear, compelling and cohesive narrative tailored to each stakeholder group.

The SCQA model is a powerful tool, as it translates complex messages into an engaging and accessible narrative. It establishes a natural momentum in the communication: moving from a familiar context to an urgent challenge, and ultimately, from the problem to the solution.

The SCQA model has four basic elements:



Example of a short PFAS narrative using the SCQA model

	Explanation	Example
Situation	Describe a situation that everyone can recognize and agree on. The situation should create a shared starting point and give the stakeholder enough context to understand the issue.	PFAS have been used in industry since the 1950's. Today, PFAS are found in millions of products across all industries. We use PFAS in selected products and processes because these substances provide stable and well-known properties.
Complication	Explain what has changed, or why the situation can no longer continue. The complication is the part that creates urgency, or a call for action. What is the problem, the risk, the conflict, the change, or the opportunity?	PFAS are highly persistent and can therefore accumulate in such large quantities that they can be harmful to the environment and humans. New EU legislation restricting the use of the entire group of PFAS is expected to be adopted in 2027.
Question	Formulate the central question that naturally arises from the situation and the complication. A good SCQA question is not broad and diffuse.	Is there an alternative to PFAS that we can use now, while maintaining product quality without taking on unnecessary risks?
Answer	Give a clear and action-oriented answer to the question. The answer should show direction and tie the narrative together in a solution or recommendation. The answer should be sharp enough for the stakeholder to think: "Yes, this is exactly what we now need to address." Make sure also to address concerns directly and acknowledge costs and dilemmas.	We should conduct a market dialogue with existing and potential suppliers to identify viable alternatives to PFAS. It is a lot of work, but we can also use it to increase transparency and simplify our supply chains as well as to rethink and improve our products.

3. Engagement strategies

Purpose: To determine and develop the best engagement strategies for each stakeholder group.

The task has 2 steps:

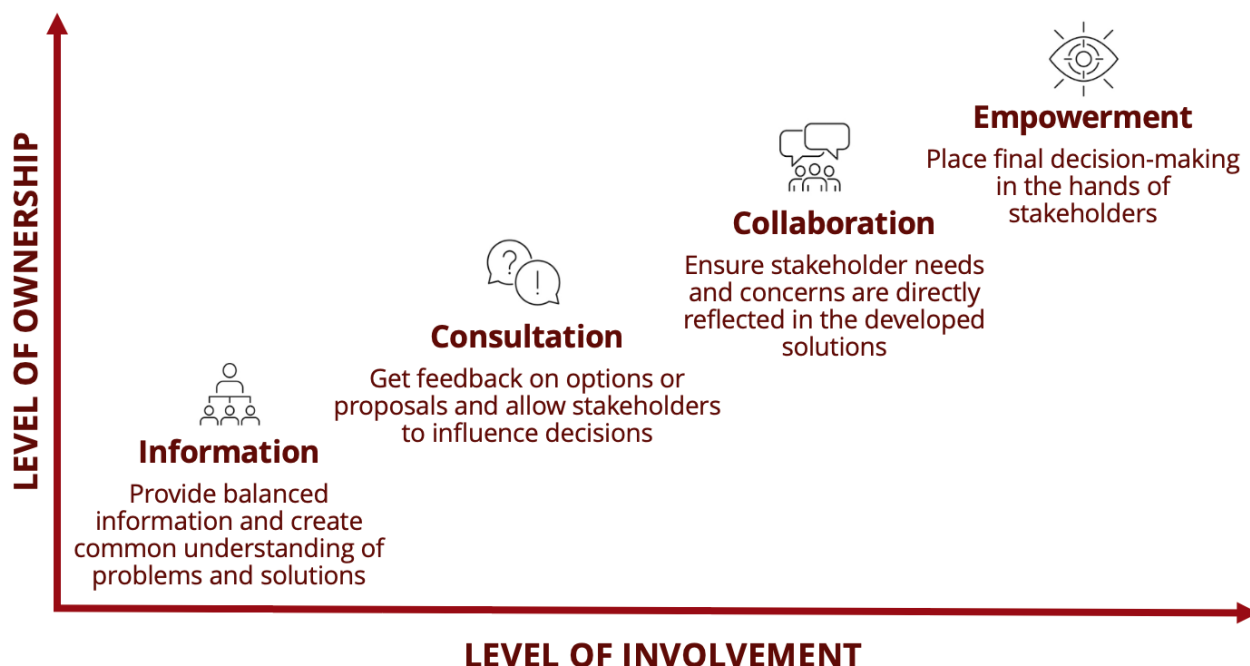
1. Choose engagement approaches
2. Conduct touchpoint analysis

1. Choose engagement approaches

Task: For each of your stakeholder groups, choose engagement approach and develop engagement activities.

There are four core approaches, each supported by a range of methods that can be used for engaging stakeholders on PFAS. Choosing the appropriate engagement strategy depends on the purpose of the engagement as well as on the stakeholder’s role and level of knowledge and influence.

The four core approaches form a spectrum of engagement intensity: Inform, Consult, Collaborate, and Empower. While meaningful engagement requires moving beyond mere information-sharing, a robust engagement strategy typically integrates elements from across the entire spectrum.



The table below outlines each engagement approach, highlighting what it is suitable for, the pros and cons as well as a few examples of associated engagement methods.

Approach	Suitable for	Pros	Cons	Examples of methods
Information	Introducing PFAS ambitions and efforts and ongoing reporting on progress	<ul style="list-style-type: none"> • Fast and cost-effective • Broad visibility of messages • Consistent messages 	<ul style="list-style-type: none"> • Low engagement • Limited feedback • Risk of “we have informed” illusion 	<ul style="list-style-type: none"> • Policy/declaration • FAQ • Explainer video • Information meeting • Newsletter
Consultation	Gathering input and seeking feedback to qualify direction and address uncertainties	<ul style="list-style-type: none"> • Increases understanding and support • Identifies concerns and barriers 	<ul style="list-style-type: none"> • Requires time and facilitation • Creates expectations of involvement • Not all voices are heard equally 	<ul style="list-style-type: none"> • Market dialogue • Questionnaire/survey • Interviews (individual or focus group) • Advisory group/user panel
Collaboration	Involvement of employees in the development and testing of PFAS alternatives	<ul style="list-style-type: none"> • Very high engagement • Solutions that work in practice • Strong ownership and learning 	<ul style="list-style-type: none"> • Resource-intensive • Risk of silo thinking • Requires clear decision-making framework 	<ul style="list-style-type: none"> • Network • Task force • Pilot project
Empowerment	Empowerment of employees to implement and manage the PFAS ambitions and solutions in operations	<ul style="list-style-type: none"> • Long-term anchoring • Local ownership • Reduces dependency on project teams 	<ul style="list-style-type: none"> • Risk of role ambiguity • Can create inconsistent practices • Requires ongoing support 	<ul style="list-style-type: none"> • Guideline/procedure • Training • Ambassador scheme • Think tank • Hotline

2. Conduct touchpoint analysis

Task: Identify and prioritise the key touchpoints for your chosen stakeholder group.

You can conduct a simple touchpoint analysis to qualify the choice of communication channels and engagement methods for each stakeholder group.

The analysis involves two steps:

1. First, map existing points of contact and evaluate their suitability for delivering PFAS-related messaging.
2. Once the current landscape is established, pinpoint communication gaps and explore new opportunities to reach your target group more effectively. For example, if your current touchpoints only support information and consultation, but you aim for a higher level of engagement – such as co-development or capacity building – you will need to establish new channels or fora.

2 examples of touchpoint analysis

