

COMMUNITY ADVISORY GROUPS

A Community Advisory Group (CAG) is a committee, task force, or board of community stakeholders that meets routinely to discuss issues involving a particular facility. CAGs allow for the exchange of concerns and information between community members, facility owners or operators, and the permitting agency on RCRA activities. These public forums allow for representatives of diverse community interests to present and discuss their needs and concerns with the government and/or the facility. CAGs can be a good way to increase active community participation in environmental decision-making and provide a voice for affected community members and groups.

The best setup for a CAG depends on the situation. For instance, a community organization may create a CAG of affected community members to ensure the community has a voice in decisions made at the facility. Facility owners or operators may create a CAG of affected community members to provide informal or formal advice to ensure the community is involved. A permitting agency may form a CAG of stakeholders from the facility, the community, and the permitting agency to discuss issues and make informed decisions related to the permitting of a facility.

In establishing a CAG, it is important to bear in mind that the size of a group can often have an impact on its effectiveness. For example, too large a group can inhibit how efficiently it can work and come to consensus on issues, and too small a group may be inadequate in representing diverse community concerns. Although CAGs are a useful tool in many situations, they may not always be appropriate. See the “When to Use” section below for a list of factors to consider before forming a CAG.

Forming a CAG does not necessarily mean that there will be universal agreement about permitting or corrective action issues. Nor does having a CAG mean there will be no controversy during the process. However, when decisions made by the facility or the permitting agency differ from the stated preferences of a CAG, the facility or the agency should accept the responsibility of explaining its decisions to CAG members.

EPA’s Office of Superfund Remediation and Technology Innovation issued [Guidance for Community Advisory Groups at Superfund Sites](#). Although there are many differences between the Superfund and RCRA programs (most notably that Superfund often deals with abandoned sites while RCRA typically deals with operating or potential new facilities), a large part of the Superfund CAG guidance discusses CAG development, membership, and training that may be applicable to some RCRA CAGs.

Required activity?

No. However, EPA regulations contain standards for advisory groups if EPA decides to require them under the Code of Federal Regulations (CFR) at Part 40. These standards are located in [40 CFR § 25.7](#). Although these standards may not apply to all types of advisory groups used in conjunction with RCRA permitting, they provide useful guidance for agencies, facilities, and public interest groups who may want to use advisory groups. Exhibit 5-3 in Chapter 5 of the [2016 Edition of the RCRA Public Participation Manual](#) contains additional information and resources on the use of CAGs and other public participation activities.

Making it Work

CAGs can be a time-consuming and expensive endeavor. Membership selection, meeting preparation and follow-up, information dissemination, and training all take resources. However, there are no Technical Assistance Grants (TAGs),

which are administered by the Superfund Program, or other resources to help defray the costs of CAGs formed under the RCRA program.

When to Use

A CAG can be formed at any point in the permitting or corrective action process, and may be most effective in the early stages. Generally, the earlier a CAG is formed, the more members can participate in and influence decision-making. However, when considering whether a CAG is appropriate for the situation, consider the following factors:

- What is the level of community concern regarding the facility?
- Has the community expressed interest in forming a CAG?
- Do groups with competing agendas exist in the community?
- Are there environmental justice issues or concerns related to the facility?
- What is the history of community involvement with the facility, or with environmental issues in general?
- What is the working relationship between the facility, the community, and the permitting agency?

It may be helpful to provide a public notice, hold a public meeting, or issue a news release in order to inform the community about the opportunity to join the CAG. The CAG may choose to provide public participation activities (such as meetings, newsletters, website updates, or availability sessions) as part of its mission.

If CAGs do not accurately reflect or account for public concerns, they may lose support in the community. In addition, uncertainty about the group's charter may cause conflict and hard feelings. When using a CAG, the mission and responsibilities of the CAG must be made clear from the start. Finally, CAGs can spend so much time agreeing on procedures that they drive away people who are more concerned with the issues. This problem can be sharply reduced if an advisory group agrees to work on a consensus basis rather than by majority vote.

How to Use

See the [Superfund CAG website](#), EPA's [Guidance for Community Advisory Groups at Superfund Sites](#), and [40 CFR § 25.7](#) (Appendix A) for information on how to set up CAGs. Keep in mind that CAGs under the RCRA program will differ from CAGs under Superfund, as they are two different programs.

Tips

- Involve the community early in the process.
- A CAG should represent the range of diverse views and perspectives of members of the community.
- CAGs can increase active community participation in environmental decision-making and provide a voice for affected community members and groups.
- CAGs promote direct, two-way communication among the community, the permitting agency, and the facility, and can highlight an organization's commitment to inclusive stakeholder input.
- Forming a CAG is time-intensive but may be well worth the investment of time and resources depending on the circumstances.