

Rachel's Environment & Health News

#495 - Chemical Industry Strategies -- Part 1

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In late 1993 the Governing Council of the American Public Health Association (APHA) unanimously approved Policy Statement 9304 urging American industry to stop using the chemical chlorine.[1] (See REHW #363.) APHA is a professional society, founded in 1872, representing all disciplines and specialties in public health. It is the heart of the American public health establishment.

Chlorine is a chemical element, one of the 92 fundamental building blocks from which everything on earth is made. Chlorine is very reactive --it aggressively grabs onto other elements to form compounds. That is why, in nature, chlorine never appears in a free state, but is always combined with other elements, usually in common table salt (sodium chloride).

Around 1900, Herbert Dow, the founder of Dow Chemical, split common salt to make commercially-valuable sodium hydroxide, releasing, as an unwanted by-product, the highly-toxic green gas, free chlorine. Mr. Dow (a chemistry teacher) soon began combining chlorine with other elements, thus creating "chlorine chemistry," giving rise to solvents, pesticides and all manner of other useful, toxic chlorinated compounds, of which there now about 15,000 in commercial use.

In Policy Statement 9304, one of the nation's premier scientific and medical associations is asking American industry to change a fundamental way of doing business. APHA recognized two exceptions: the pharmaceutical industry and disinfection of public water supplies. But all other uses of chlorine as an industrial feedstock should be phased out, APHA urged.

In Statement 9304, the APHA explained its opposition to the use of chlorine as an industrial feedstock:

** "...virtually all chlorinated organic [carbon-containing] compounds that have been studied exhibit at least one of a wide range of serious toxic effects such as endocrine dysfunction, developmental impairment, birth defects, reproductive dysfunction and infertility, immunosuppression, and cancer, often at extremely low doses and... many chlorinated organic compounds, such as methylene chloride and trichloroethylene, are recognized as significant workplace hazards."

APHA spelled out its rationale for such a sweeping phase-out in this long sentence:

** "Recognizing the subtle and widespread effects on human and wildlife health attributed to exposure to chlorinated organic chemicals and our current inability to identify, predict or control the release of these compounds from manufacturing processes, and that the bi-national [Canada and U.S.] Science Advisory Board of the International Joint Commission on the Great Lakes (IJC) concluded by the weight of scientific evidence that exposure to all organochlorines should be presumed to pose a health problem and that policies to protect public health should be directed toward eventually achieving no exposure to chlorinated organic chemicals as a class rather than continuing to focus on a series of isolated, individual chemicals."

Thus the APHA said, in effect: we can't study all the many possible toxic effects of 15,000 individual chlorinated chemicals. Therefore, based on the weight of the evidence, we should assume all chlorinated chemicals are dangerous and we should avoid all exposures to them, to prevent harm. Furthermore, the APHA said, because we cannot avoid releases (and therefore exposures) whenever we make these compounds, the only way to PREVENT exposures is to stop making chlorinated compounds: "...the only feasible and prudent approach to eliminating the release and discharge of chlorinated organic chemicals and consequent exposure is to avoid the use of chlorine and its compounds in manufacturing processes," the APHA said.

As a response to such calls for phasing out chlorine as an industrial

feedstock, the Chemical Manufacturers Association formed the Chlorine Chemistry Council (CCC) in 1993.[2] The CCC soon hired an aggressive DC-based public relations firm, Mongoven, Biscoe and Duchin (MBD) [phone: (202) 429-1800], to develop and carry out a strategic plan for defending chlorine.

MBD makes part of its living by spying on churches, labor unions, environmentalists, professors and students, and selling information about them to corporate clients, such as CCC. In addition, MBD helps corporate clients develop strategies to discredit people who are advocating change. In its own words, MBD "assists corporations in resolving public policy issues being driven by activist organizations and other members of the public interest community. We help clients anticipate and respond to movements for change in public policy which would affect their interests adversely.... Forces for change often include activist and public interest groups, churches, unions and/or academia.... MBD is committed to the concept that it is critical to know who the current and potential participants are in the public policy process, to understand their goals and modus operandi, and to understand their relative importance. To this end, MBD maintains extensive files on organizations and their leadership...." (See REHW #361.)

Jack Mongoven, co-founder of MBD, has taken a keen personal interest in the chlorine strategy, and has developed a far-reaching plan to help the CCC discredit efforts to phase out chlorine.

Like any good plan, Jack Mongoven's blueprint contains long-term strategic goals, and day-to-day tactical elements.

Mongoven's long-term strategy is to characterize the "phase out chlorine" position as "a rejection of accepted scientific method," a violation of the chlorine industry's Constitutional right to "have the liberty to do what they choose," and in that sense as a threat to fundamental American values.[3]

On a regular basis now, Jack Mongoven sends the CCC a formal update on what anti-chlorine activists are doing, including specific steps that CCC should take to undercut and discredit them.

In a report to the CCC titled "Activists and Chlorine in August [1994]," MBD notes that, "Anti-chlorine activists are using children and their need for protection to compel stricter regulation of toxic substances. This tactic is very effective because children-based appeals touch the public's protective nature for a vulnerable group and that makes it difficult to refute appeals based on its needs. This tactic also is effective in appealing to an additional segment of the public which has yet to [be] activated in the debate, particularly parents." [4]

The MBD report includes a specific example of environmentalists "using children." The report describes activities of the Children's Environmental Health Network (CEHN): "The CEHN approach, which is just taking shape, is illustrative of the nature of the debate concerning children will take during the next several months. [sic] The tone of the debate will focus on the needs of children and insist that ALL safeguards be taken to ensure their safety in development. For most substances, the tolerances of babies and children, which includes fetal development, are obviously much lower than in the general adult population. Thus, 'environmental policies based on health standards that address the special needs of children,' would reduce all exposure standards to the lower possible levels." The MBD report says that, although CEHN is not, itself, an anti-chlorine group, "CEHN has adopted proposals by anti-chlorine groups to secure a national health policy based on the needs of children."

In sum, the MBD report says, "By characterizing children as the biggest losers of [sic] toxic exposure, the activists have secured an approach that will attract more mainstream support for their anti-chemical, anti-chlorine agendas."

A 5-page cover memo signed by Jack Mongoven, dated September 7, 1994, summarizes the key points in the August report and lists many specific steps that CCC should take to defend chlorine and discredit the activists: "It is obvious that the battleground for chlorine will be women's issues--reproductive health and children--and organizations with important constituencies of women opinion leaders should have priority," Mongoven writes.[5]

"It is especially important to begin a program directed to pediatric groups throughout the country to counter activist claims of chlorine-related health problems in children," Mongoven writes.

MBD's August report listed a series of conferences for breast cancer survivors scheduled by WEDO (Women's Environment & Development Organization) in New York [phone: 212/759-7982]. The report says, "Devra Lee Davis is expected to direct the Clinton Administration's policy governing breast cancer and we expect her to try to convert the breast cancer issue into a debate over the use of chlorine. As a member of the administration, Davis has unlimited access to the media while her position at the Health and Human Services (HHS) [department] helps validate her 'junk science.' Davis is scheduled to be a keynote speaker at each of the upcoming WEDO breast cancer conferences."

In his cover memo, Jack Mongoven suggests that CCC deal with Dr. Davis, the breast cancer survivors, and anti-chlorine sentiments as follows:

** Schedule through KPR [Ketchum Public Relations, in Washington, D.C.] editorial board meetings in Dayton prior to Department of Health and Human Services Devra Lee Davis[s] speech to a forum on breast cancer sponsored by Greenpeace and WEDO to be held in Dayton....

** Enlist legitimate scientists in the Dayton area who would be willing to ask pointed questions at the conference....

** Stimulate peer-reviewed articles for publication in the JAMA [Journal of the American Medical Association] on the role of chlorine chemistry in treating disease....

** Convince through carefully crafted meetings of industry representatives (in pharmaceuticals) with organizations devoted to specific illnesses, e.g., arthritis, cystic fibrosis, etc., that the cure for their specific disease may well come through chlorine chemistry and ask them to pass resolutions endorsing chlorine chemistry and communicate those resolutions to medical societies. If it is possible to identify potential prominent allies in the organizations before the meetings that would be preferred...."

Next week: Jack Mongoven designs strategies for the CCC to counter and discredit what he says are the really serious threats: the precautionary principle, and shifting the burden of proof onto the chemical corporations.

--Peter Montague

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[1] "9304. Recognizing and Addressing the Environmental and Occupational Health Problems Posed by Chlorinated Organic Chemicals," AMERICAN JOURNAL OF PUBLIC HEALTH Vol. 84, No. 3 (March 1994), pgs. 514-515.

[2] The Chlorine Chemistry Council (CCC) is a "business council of the Chemical Manufacturers Association (CMA)," founded in 1993 and located in Arlington, Virginia. CCC has no published telephone number. CCC is part of CMA but has a separate budget, according to Janet Flynn, a spokesperson for CCC whose phone is (703) 741-5827.

[3] John O. Mongoven, "The Precautionary Principle," ECO-LOGIC (March, 1995), pgs. 14-16. ECO-LOGIC is a publication the Environmental Conservation Organization, in Hollow Rock, Tennessee; phone: (901) 986- 0099. Our thanks to Dan Barry of the CLEAR project at the Environmental Working Group in DC [phone: 202-667-6982], and to Keith Ashdown, Cancer Prevention Coalition, in Chicago [(312) 467-0600] and to John Stauber, editor of PR WATCH in Madison, Wis. [(608) 233-3346] for information about ECO and about MBD.

[4] "Activists and Chlorine in August [1994]," MBD ISSUE RESEARCH AND ANALYSIS (Washington, D.C.: Mongoven, Biscoe, and Duchin [phone: 202/429-1800]), 1994.

[5] Memo from Jack Mongoven to Clyde Greenert/Brad Lienhart dated September 7, 1994, and titled, "MBD Activist Report for August," (Washington, D.C.: Mongoven, Biscoe, and Duchin [phone: 202/429-1800]), 1994.

Descriptor terms: american public health association; chlorine; dow chemical; ijc; chemical manufacturers association; chlorine chemistry council; mongoven, biscoe and duchin; jack mongoven; children; children's environmental health network; wedo; women's environment & development organization; devra lee davis;