

with the United States NGO community. Using such ties and publicly available information, MBD has earned a solid reputation for providing clients with objectively "fair" and timely assessments of public interest groups.

Increasingly, our clients have been seeking information and guidance concerning developments in Asia. To that end, MBD has set out to develop a series of "profiles" of some of the leading non-governmental entities in Asia. We received exceptional levels of cooperation from NGOs in Europe and Latin America for previous projects, and we hope that the Asian community will be equally helpful. Accuracy is crucial to our project, and accuracy is best obtained from the source.

Can you help us? We would be very appreciative if you or a colleague could send us via phone, fax or mail some information about your organization. We obviously would welcome any materials that you believe would give us an accurate picture of your group—its basic structure, issue concerns, activities (past, present and future), alliances and goals. Perhaps you would be able to include samples of any newsletters or other publications your group publishes. In addition, we would be grateful for any thoughts you may have regarding the overall situation in your country and in Asia with respect to the issues you care about.

We hope to complete our research in February, so your earliest reply would be highly valued. We have enclosed some additional information about MBD. We look forward to hearing from you. Thank you in advance for your help in this matter.

Sincerely,

Bartholomew Mongoven

P.S. Although MBD's office is English-speaking, we would be pleased to receive any of your communications and/or literature that are not in English. Thank you.

2. Enclosed Overview Describing MBD

MBD advises clients on how to work with individual s, groups and issues on a cooperative, day-to-day basis. MBD also assists clients in developing long-term strategies to resolve contentious public policy issues in a balanced and socially responsible matter. MBD is comprised of individuals who have extensive experience interacting with environmental and consumer groups, churches and other organizations which seek changes in public policy.

MBD's principals are well versed in the policy development process and have worked closely with corporate officers and national political leaders in addressing issues of local, national and global significance. As a company, MBD is committed to the concept that corporate decision makers must develop a better appreciation of the public interest movement. Our efforts help corporate leaders understand the dynamics of citizen activism and its importance in the development of corporate public policy.

3. Enclosed Organizational Survey

Answers to the following questions will provide MBD with the background information that is most important to us. Please respond to as many questions about your organization as you can. Detailed answers will help our research and will be greatly appreciated. . . . Thank you.

Where is your organization's headquarters?

Other offices or field locations?

Who are your principal officers and staff?

Approximately how many members do you have?

What publications do you make available to members and the community?

What is your annual budget and what are your sources of funding (foundation grants, membership donations, etc.)?

How do you achieve your desired ends (public information, protests, letter-writing campaigns, boycotts, etc.)?

What are the most important and influential NGOs in your country?

What other NGOs do you work with?

When and why was your organization founded?

Who were its organizers?

What are your principle concerns/issues? Goals/objectives?

What do you consider the most significant achievement your group has made?

What are your most recent campaigns and achievements?

What is the predominant philosophy of your organization?

Thank you for taking the time to help us. Please send or fax completed surveys and/or other materials to: MBD, Inc., 1100 Connecticut Ave., Washington, DC 20036, Fax 1 202 429 8655.

4. Response from Wilderness Society, May 26, 1995

Dear Bartholomew,

Thank you for your letter and survey of 25th January 1995 seeking details of environmental NGOs in the Asian region.

The Wilderness Society will not be assisting in your survey in view of your activities described in the October-December 1993 edition of *PR Watch* ("Spies for Hire") I assume that you are familiar with the article but if not suggest that you subscribe to *PR Watch*.

I have also circulated the *PR Watch* article and our recommendation that NGOs do not co-operate with your survey to environmental groups in Australia, New Zealand and a number of groups in Asia. I also specifically mentioned your survey to a major gathering of environmental activists from Australia and Papua New Guinea as an example of the activities of public relations firms.

May your survey and the campaigns you run on behalf of your corporate clients fail.

Yours sincerely,

Bob Burton, Coordinator
Wilderness International
Hobart, Tasmania, Australia

PR WATCH

Public Interest Reporting on the PR/Public Affairs Industry

VOLUME 3, NUMBER 2

SECOND QUARTER 1996

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WOMEN AND CHILDREN FIRST ON THE FRONT LINE OF THE CHLORINE WAR

"The battleground for chlorine will be women's issues," reveals a recently-leaked document from the notorious MBD "public affairs" firm that specializes in targeting and defeating citizen groups.

The document, an example of cynical disregard for human safety that defies parody, is one of several confidential memos delivered to Greenpeace by an anonymous corporate whistleblower. The documents provide a revealing peek behind the scenes at the secretive activities of Mongoven, Biscoe & Duchin (MBD) and its advice to the chemical industry "as to how best to counter . . . activists' claims of the evils associated with dioxin as a weapon against chlorine chemistry."

There is nothing accidental about MBD's use of terms like "battleground" and "weapon." Although company president Jack Mongoven does not have a background of military service, he is an enthusiastic student of strategy who can cite from memory the ideas of military theorists such as Sun Tzu and Carl von Clausewitz.

As a PR counselor, Mongoven specializes in intelligence-gathering, sending his staff to monitor activist groups and providing classified reports on their activities to his clients, for whom MBD develops

continued on next page

FLACK ATTACK

A PR executive for DuPont once asked us, "Are you the people picking on Jack Mongoven?"

Yes, we are, and happy to oblige

The first issue of *PR Watch*, published in October 1993, featured a lengthy exposé of the Mongoven, Biscoe & Duchin PR firm, documenting instances in which MBD employees have lied and used other unsavory tactics to gather information used to defeat environmental and consumer groups.

Mongoven told a reporter he was "outraged" by what we had written. "We always identify exactly who we are," he claimed. "In every case, we had identified ourselves as a Washington consulting firm. I don't think that makes you a spy."

Ever since that time, however, people have been slipping information to us, adding little tidbits about MBD's activities, which literally span the globe.

"Look which slime balls are poking their nose in down here!" commented an Australian environmental activist, who provided some of the MBD documents we feature in this issue. An activist in Michigan described her recent interrogation by an MBD operative as an encounter with "the forces of darkness."

Corporations, however, love MBD. Its dozens of clients include the biggest Fortune 500 industries and their lobby groups.

MBD has helped its clients divide and conquer citizen groups concerned about problems including acid rain, clean air, clean water, toxic wastes, South Africa, nuclear energy, dioxin, biotechnology, endangered species, oil spills and consumer safety.

The documents we quote in this issue show how MBD's activities on all of these issues are based on a

continued on next page

sophisticated strategies to defeat environmentalists and other enemies of corporate privilege.

Military terminology recurs throughout MBD's 1994 reports to the Chlorine Chemistry Council (CCC), which warn ominously that the Natural Resources Defense Council (NRDC) and Ralph Nader's Public Interest Research Group (PIRG) are preparing for "protracted battle . . . PIRG's Green Corps is collaborating with NRDC's Clean Water Network (CWN) on a project to recruit and train activists in an anti-chlorine campaign . . . initially targeting the pulp and paper industry."

"Anti-chlorine activists are using children and their need for protection to compel stricter regulation of toxic substances. . . . Health standards that address the special needs of children would reduce all exposure standards to the lowest possible levels."

According to MBD, "The move by CWN to bring Green Corps into a more active role in the anti-chlorine battle appears to be part of an overall strategy devised by the network's participants to broaden the anti-chlorine attack by recruiting and training enthusiastic young

Flack Attack *continued from page 1*

crass love of profit and a callous disregard for what it sneeringly dismisses as the "emotions of the public and its concern for future generations."

MBD gathers dossiers on citizen groups in order to identify groups that can be persuaded to "cooperate with industry." Your first opportunity to cooperate comes when an MBD employee calls and asks you to answer some questions. If you meet its standards, the next step may be an invitation for your organization to "partner" with Big Business on some mutual PR project—perhaps with corporate contributions of money applied like a poultice on your increasingly numb conscience.

Unfortunately, many public interest groups—especially the ones headquartered inside the Washington Beltway—have allowed themselves to be mesmerized by these tactics. They ought to take a look at the documents reprinted in this issue, so they can see what they're getting mixed up in, and how they are being used.

activists to carry the anti-chlorine banner on several fronts. . . . [CWN will] expand its assault by using its constituent groups and other NRDC resources to press attacks on other areas of chlorine chemistry—product-by-product, step-by-step, application-by-application."

This domino theory serves MBD's interests as much as, if not more than, the interests of its corporate clients. MBD knows perfectly well that it is drumming up more business for itself when it uses alarmist rhetoric to paint a sinister picture of the environmental movement.

"All of MBD's suggestions are billable hours," observes Charlotte Brody of the Citizens Clearinghouse for Hazardous Waste. "The more ideas they come up with, the more money they make."

MBD's memos hint darkly at a nefarious conspiracy masterminded by Greenpeace, noting that although PIRG says it "has no formal affiliation with Greenpeace, . . . there is a long-standing close association and history of cooperation between NRDC, U.S. PIRG, the Sierra Club and Greenpeace on a variety of issues."

According to MBD, this cooperation adds up to "a grand strategy . . . to give Greenpeace a strong lead on the issues but to use various groups—some of which are more acceptable to the mainstream—to appear to lead specific issues, thus giving the overall campaign the appearance of a widespread, generally accepted grassroots uprising against chlorine chemistry."

SEXUAL PERVERSIONS

The world trade in chemicals includes 15,000 synthetic chlorinated compounds, including DDT, dioxin, PCBs, and other pesticides. Chlorinated compounds have raised particular concern because they persist in the environment rather than breaking down, and because they have a record of causing health and environmental problems.

One of the most recent and alarming discoveries has been the evidence that synthetic chemicals can actually mimic and disrupt natural body hormones. A growing body of scientific research implicates these "endocrine disruptors"—half of which are chlorinated compounds—in a range of alarming developmental abnormalities ranging from undeveloped and deformed penises in Florida alligators to same-sex matings among seagulls, dying dolphins in the Mediterranean, and declining fertility in Arctic seals and polar bears. In humans, a series of worldwide studies have shown an alarming decrease in male sperm counts, which have plummeted since 1938 to half the level then considered normal.

MBD's memos to the Chlorine Chemistry Council show that it is aware of these concerns. The memos cite,

and do not attempt to refute, the U.S. Environmental Protection Agency's 1994 reassessment of dioxin.

According to MBD, the EPA report "indicated that there is no safe level of dioxin exposure and that any dose no matter how low can result in health damage. New findings on the mechanism of dioxin toxicity show that tiny doses of dioxin disrupt the action of the body's natural hormones and other biochemicals, leading to complex and severe effects including cancer, feminization of males and reduced sperm counts, endometriosis and reproductive impairment in females, birth defects, impaired intellectual development in children, and impaired immune defense against infectious disease."

Rather than concern for these "complex and severe effects," however, MBD is worried about defending the chlorine industry's image.

"One of the most significant recent developments in the anti-chlorine campaign is the National Wildlife Federation's (NWF) publication of *Fertility on the Brink*, which attributes fertility and reproductive problems to exposure to chlorine-based chemicals," warns Jack Mongoven in a September 7, 1994 memo. He goes on to complain that "NWF uses the issue of fertility as a vehicle to play on the emotions of the public and its concern for future generations."

Worse yet, he adds, "Anti-chlorine activists are also 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. . . . The tactic also is effective in appealing to an additional

segment of the public which has yet to be activated in the debate, particularly parents. . . . 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 lowest possible levels."

BABY KILLERS

This attitude toward children's health has characterized Jack Mongoven's career in public relations since its beginning in 1981, when he was hired by the Nestlé corporation to defend its infant formula marketing practices in the Third World. Activists organized a boycott of Nestlé products, charging that the company's marketing tactics were aimed at disrupting women's natural breastfeeding, killing children by exposing them to infant formula mixed with contaminated water.

Mongoven and a former Pentagon staffer named Rafael Pagan organized the Nestlé response, which developed dossiers on the churches and other groups leading the boycott coalition. Nestlé used this information to play on divisions and rivalries within the coalition, using strategic, minimal "reforms" to talk wavering "moderates" into abandoning the boycott.

This strategy has become MBD's standard method for neutralizing activist groups on behalf of a variety of corporate clients. In its analysis of the dioxin opposition,

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the New York-based environmental group INFORM emerges as a "moderate" group worth targeting for possible cooptation.

According to a May 1994 MBD document, INFORM "has a solid history of working with corporations, citizen groups, major environmental organizations and governments at all levels," states a May 1994 MBD document. "Although it is a relatively small organization with a small budget, it is very well regarded by mainline environmental organizations, government agencies and industry. Some of the more radical grassroots environmentalists think it is too friendly with industry. . . . It also receives support from corporations and government agencies."

"It is especially important to begin a program directed to pediatric groups . . . to counter activist claims."

MBD also recommends a standard, highly deceptive PR strategy known in the trade as the "third party technique": setting up front groups which appear to be independent "third parties" in the debate while in reality they mouth the client's desired message. As one example of this strategy, the May 1994 MBD memo advises the chlorine industry to "highlight the need for some established criteria on risk assessment" and "establish third-party entities devoted to developing these standards in the near future."

In response to evidence of chlorine-related health problems in children, MBD states, "It is especially important to begin a program directed to pediatric groups throughout the country and to counter activist claims."

Under a section titled "Prevent Medical Associations from Joining Anti-Chlorine Movement," the document advises industry to "Create a panel of eminent physicians and invite them to review data regarding chlorine as a health risk and as a key chemical in pharmaceuticals and medical devices. . . . Stimulate peer-reviewed articles for publication in the JAMA 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 their resolutions to medical societies."

MBD
Update and Analysis

CONFIDENTIAL

For:
Chlorine
Chemistry
Council

Date: May 18, 1994

The cover of a 1994 report from MBD to the Chlorine Chemistry Council, which was recently leaked to Greenpeace by a whistleblower.

BREAST BEATING

MBD expresses particular alarm at the appointment of Dr. Devra Lee Davis, an epidemiologist and expert on the relationship between environmental contamination and breast cancer, to direct the Clinton Administration's policy governing breast cancer.

"As a member of the Administration, Davis has unlimited access to the media while her position at the [Department of] Health and Human Services helps validate her 'junk science,'" the memo argues.

"Davis is scheduled to be a keynote speaker at each of the upcoming . . . breast cancer conferences . . . sponsored by Women's Economic and Development Organization (WEDO)," warns the MBD memo. "Each conference is expected to emphasize a regional interest. . . . Topics include 'Environment and Breast Cancer,' 'Organochlorines, Pesticides and Breast Cancer' and 'Environmental Justice.'"

In response, MBD advises the Chlorine Chemistry Council to shadow and undermine the WEDO conferences. Prior to the 1994 WEDO conference in Dayton, Ohio, for example, MBD recommended that the CCC use another of its PR firms, Ketchum Public Relations, to schedule "editorial board meetings in Dayton prior to . . . Davis' speech," and "enlist legitimate scientists in the Dayton area who would be willing to ask pointed questions at the conference."

These tactics were apparently successful in containing the "Devra crisis." Davis's supposedly "unlimited access" failed to generate even a ripple of media coverage, and pressure from industry contributed to her ouster from the Administration in October 1995. ■

BEHIND ENEMY LINES

The excerpts below are taken from a series of confidential "Update and Analysis" reports written for the Chlorine Chemistry Council by PR research firm Mongoven, Biscoe & Duchin.

"They are taking us more seriously than we sometimes take ourselves," commented Charlotte Brody, a registered nurse and director of Citizens Clearinghouse for Hazardous Waste. "I think of myself as jaded," Brody said after reviewing the leaked documents, "but it still takes my breath away to see a professional, totally amoral directive that editorial visits be done because the scientific information that Devra Lee Davis has is too dangerous to go unfiltered."

Brody was also struck by MBD's "recommendations that the chlorine industry should go to health groups and sign them up to defend the benefits of chlorine, without telling them what they are really signing up for, and before we can get to them and talk about how dioxins and other endocrine disrupters are harming their health. MBD doesn't suggest going out and talking about why dioxin isn't as dangerous as we say. Instead, it's a much more clever and insidious strategy, where they sign up people with cystic fibrosis to defend the benefits of chlorine chemistry by suggesting to them that without chlorine there will never be a cure for their disease. They don't even bring up dioxin, but they falsely suggest that we would bring an end to pharmaceutical research."

**MBD UPDATE AND ANALYSIS
CONFIDENTIAL
FOR: CHLORINE CHEMISTRY COUNCIL
DATE: MAY 18, 1994
ACTIVIST UPDATE: CHLORINE**

NRDC and U.S. PIRG Join Forces to Recruit and Train Anti-chlorine Activists for Protracted Battle

U.S. PIRG's Green Corps is collaborating with NRDC's Clean Water Network (CWN) on a project to recruit and train activists in an anti-chlorine campaign that is initially targeting the pulp and paper industry.

The move by CWN to bring Green Corps into a more active role in the anti-chlorine battle appears to be part of an overall strategy devised by the network's participants to broaden the anti-chlorine attack by recruiting and training enthusiastic young activists to carry the anti-chlorine banner on several fronts. . . .

Green Corps is a three-year-old environmental training project of Ralph Nader's U.S. Public Interest Research Group (U.S. PIRG) and is based in U.S. PIRG's offices in Wash-

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This advertisement for free classroom materials is one of the tools the Chlorine Chemistry Council uses to propagandize children. Its educational materials stress the benefits of chlorine and gloss over dangers, while promising to teach kids "how society uses science to weigh risks and benefits in areas such as public health."

At the same time, Brody sees grounds for optimism in the fact that a corporate whistleblower had the courage to risk the consequences of releasing MBD's documents to the public. "Things like these documents appear because someone feels it's awful to walk around pretending it's just business. One of our hopes is that people aren't from cyborg land." ■

ington, D.C. . . . [PIRG] follows the Greenpeace line on chlorine chemistry but, according to its staff people, it has no formal affiliation with Greenpeace except through the Clean Water Network.

While that may be true in the strictest interpretation, there is a long-standing close association and history of cooperation between NRDC, U.S. PIRG, the Sierra Club and Greenpeace on a variety of issues. . . .

CWN, a project of the Natural Resources Defense Council (NRDC), claims chlorine causes birth defects, reproductive problems, cancer and other human- and animal-health problems. The network, based in NRDC's offices in Washington, DC, has a staff, publishes a monthly newsletter and claims to have several hundred groups associated with it. It is a highly active group that meets monthly to exchange information among members and to give direction on clean water issues.

Originally CWN was most active on issues arising out of the Great Lakes but it is now expanding into a much broader area of activism with particular emphasis on chlorine chemistry. . . . It is expected to expand its assault by using its constituent groups and other NRDC resources to press attacks

on other areas of chlorine chemistry—product-by-product, step-by-step, application-by-application. . . .

All of this is consistent with what a key person on chlorine issues at Greenpeace said is Greenpeace's plan to orchestrate a grand strategy that encourages various environmental groups to concentrate on specific aspects of chlorine chemistry where they can be most effective.

The idea behind the strategy is to give Greenpeace a strong lead on the issues but to use various groups—some of which are more acceptable to the mainstream—to appear to lead specific issues, thus giving the overall campaign the appearance of a widespread, generally accepted grassroots uprising against chlorine chemistry.

CWN is an important element in the Greenpeace strategy because it provides a forum for Greenpeace to communicate and coordinate the various parts of its anti-chlorine efforts and to recruit activist groups and their members to carry a big share of the battle.

Greenpeace Says Dioxin is a Public Health Emergency and Calls for Global Chlorine Ban

Greenpeace, as expected, has called the EPA draft Dioxin Reassessment Study justification for a global chlorine ban. It says the study clearly indicates a national public health emergency. . . .

The dioxin reassessment began in 1991. Greenpeace began its U.S. anti-chlorine campaign based on potential birth defects in late 1992. . . . Greenpeace says action is needed to ban chlorine in incinerators, paper and plastic because levels of dioxin currently found in the bodies of the general human population, in the food chain, and in the environment are "already in the range at which severe effects on reproduction, development, and the immune system occur."

Greenpeace says the U.S. EPA study, a draft summary of a three-year scientific reassessment of the toxicity of dioxin, "confirms that fetal developmental and immune system damage are among the most serious health threats from dioxin exposure." Greenpeace, which obtained a draft of the report before its scheduled release in June, called for immediate action to restrict major industrial uses of chlorine and chlorinated chemicals, which create dioxin when produced, heated, processed, or burned.

"The U.S. EPA's findings indicate a public health emergency from dioxin that is not going to go away until industry's addiction to chlorine is broken," said Greenpeace's Rick Hind. "We need emergency action to eliminate any further discharges of dioxin, and that means a comprehensive phase-out of chlorine and chlorine-based chemicals."

Greenpeace says the largest dioxin sources are incinerators burning chlorinated wastes, pulp mills that use chlorine and chlorine dioxide bleaches, and the manufacturer of PVC (or vinyl) plastic; but all other sectors that use or burn chlorine also result in dioxin formation. Greenpeace said that the EPA should take emergency action to address these three priority areas, while long-term plans are initiated to phase out all other chlorine-based processes. . . .

The U.S. EPA's study indicated that there is no safe level of dioxin exposure and that any dose no matter how low can result in health damage. New findings on the mechanism of dioxin toxicity show that tiny doses of dioxin disrupt the action of the body's natural hormones and other biochemicals, leading to complex and severe effects including cancer, feminization of males and reduced sperm counts, endometriosis and reproductive impairment in females, birth defects, impaired intellectual development in children, and impaired immune defense against infectious disease. . . .

Currently many industrialized nations allow industries to release dioxin within "acceptable discharge limits," but since any dose of dioxin is hazardous, no discharge can now be considered "acceptable." Further, dioxin is so persistent that even small releases build up over time in the environment and in the human body. . . .

INFORM Unaffected by Reassessment

Bette Fishbein, solid waste research analyst at INFORM, says the EPA's dioxin reassessment will not alter INFORM's position on incineration. . . .

INFORM is a widely respected environmental research group based in New York City. It mainly focuses on identifying, researching and evaluating pollution caused by people, governments and industry. It also tries to develop "solutions" to the pollution problems it studies.

The organization has a solid history of working with corporations, citizen groups, major environmental organizations and governments at all levels. Although it is a relatively small organization with a small budget, it is very well regarded by mainline environmental organizations, government agencies and industry. Some of the more radical grassroots environmentalists think it is too friendly with industry. . . .

The organization's leaders are most effective at reaching lawmakers at the municipal, state and federal levels. It is currently very influential on legislation dealing with solid-waste management and hazardous-waste reduction and its influence is growing. INFORM's personnel, especially President Joanna Underwood, testify frequently on environmental issues before state and federal legislative and regulatory bodies.

INFORM has 1500 individual members. It also receives support from corporations and government agencies.

Cattlemen Form Industry Group on Dioxin

The National Cattlemen Association (NCA) is coordinating a group of affected industries to respond to the EPA's report on the reassessment of dioxin.

The group—called the Dioxin Working Group—currently includes the National Milk Producers Federation, American Society of Animal Science, National Broiler Council, National Turkey Federation, International Dairy Foods Association, American Sheep Industry, National Pork Producers Council, American Meat Institute, National Renderers Association, American Farm Bureau Federation and the National Food Producers Association.

Representatives from the working group met on May 13 with Lynn Goldman, EPA's assistant administrator of prevention, pesticides and toxic substances, and EPA's political point person on dioxin. . . . At the meeting Goldman said that "we've always known that dioxin is toxic" and she said she was pleased that the report "gave us proof." . . .

The industry groups have met with United States Department of Agriculture (USDA)/Animal Research Service and Food Safety and Inspection Service to discuss USDA's plans for looking at levels of dioxin in cattle. . . .

The Dioxin Working Group also is talking to hill staffers about its view of the report and it has met with other groups that are affected by the report, such as [the Chemical Manufacturers Association] and the Incinerator Industry to ascertain what each is doing and what messages they are sending out. At this time, the dioxin source industry groups are concentrating on questioning the toxicology data the report relies on. . . .

NCA and its allies in the working group have a history of strong relations with the Agriculture department, and it's certain they will use these solid ties to put pressure on EPA through Agriculture to make sure the final report is responsible, particularly the last chapter.

Second Citizens' Conference

Gateway Green Alliance is sponsoring the "Second Citizen's Conference on Dioxin: A Training Program and Times Beach Reunion" to be held July 29-31, 1994 in St. Louis. . . .

Panel discussions will address dioxin's "Mechanisms of Action" for affecting living organisms. A second panel will explore long term "Health and Environmental Effects." Greenpeace scientists will conclude the afternoon session with a discussion of how industry can function without chlorine chemistry.

Other sessions at the conference will share the theme of "citizens being told that dioxin was less harmful than it was later found out to be." . . . Former Times Beach residents will explain what happened to them. A researcher from the University of Milan will describe the 1976 explosion in Seveso, Italy and the results of recent studies. The session will close with an "Update on Vietnam Veterans and Agent Orange." . . .

U.S. PIRG to Check Out Dow and [Chemical Manufacturers Association]

Ralph Nader's Washington, DC-based U.S. PIRG is looking into Dow and CMA's PAC spending "to see what 'informal channels' were used to 'moderate' positions in Congress" on the Clinton plan to study a phase-out of chlorine-based chemicals.

PIRG's reference is to a letter from Dow's Richard Sosville in which he pledged to work within "formal and informal channels" in Washington to "moderate this position."

PIRG says its report "should shed some light on the industry's influence—and in an election year, force some members of Congress to stop short before selling out to the special interests."

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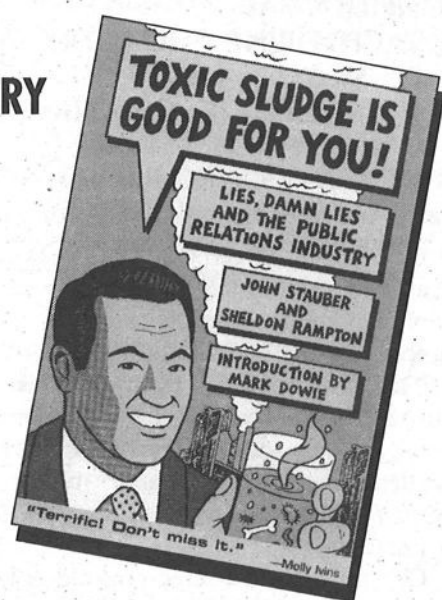
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MEMORANDUM TO:

CLYDE GREENERT / BRAD LIENHART

FROM: JACK MONGOVEN

DATE: SEPTEMBER 7, 1994

RE: MBD ACTIVIST REPORT FOR AUGUST

Attached is a brief report on anti-chlorine groups' activities in August along with our characterization of those activities. Recommendations regarding the individual activists were forwarded with the original detailed reports.

Also attached is a list of all the recommendations we provided [the Chlorine Chemistry Council] in August as to how best to counter the activists. The main recommendation—to mobilize science against the precautionary principle—still applies and dovetails with the long range objectives regarding sound risk assessment.

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. . . .

It is important in all cases to stay ahead of the activists, e.g., get to the New Orleans media and opinion leaders before the Chemical Week Chlorine Conference and the same in each of the cities where [the Women's Economic and Development Organization] will hold conferences this fall.

Let me know if you need more, e.g., we maintain calendars of anti-chlorine events and could include same if you would like.

Summary of MBD Recommendations to CCC (Chlorine Chemistry Council)

August 1994

- Special efforts should be made for the [November 1994, New Orleans] *ChemicalWeek* conference on chlorine. KPR (Ketchum Public Relations) should work with journalists, especially those who will be covering the conference, and CCC should work with *ChemicalWeek* about the tactics Greenpeace and its allies employ to gather media attention. Mobilize the attendees and communicate (by written and verbal communication) the threat the radicals pose and how to deal with it.
- Take advantage of the schisms [within] the Administration, i.e. within EPA and among EPA, USDA and FDA on the risk assessment section of the Dioxin Reassessment. CCC should quietly work with the industry coalitions to ensure that USDA and FDA are perceived to have the support of strong constituencies. . . .
- Engage [Ketchum Public Relations] to reach out to editorial boards to highlight flaws in the risk assessment portion of the dioxin reassessment.
- Engage a broad effort on risk assessment within the scientific community, even in groups which have taken positions against chlorine.
- Accelerate the program to bring about agreed-upon risk assessment policy and the deployment of vehicles of sound science.

- Take advantage of the opportunity . . . to highlight the need for some established criteria on risk assessment which will be widely accepted by scientists, industry, the people and governments.
- Move quickly to take advantage of the visibility of the shortcomings of the current system by having scientists and Congressmen ready to call for the process on risk assessment CCC and [Chemical Manufacturers Association] would like to see put in place.
- Schedule, through [Ketchum Public Relations], editorial board meetings in Dayton prior to Department of Health and Human Services Devra Lee Davis speech to a forum on breast cancer sponsored by Greenpeace and [the Women's Economic and Development Organization] to be held in Dayton, Ohio, in October.
- Enlist legitimate scientists in the Dayton area who would be willing to ask pointed questions at the conference.
- Continue existing CCC public relations and communications programs to counter activists' claims of the evils associated with dioxin as a weapon against chlorine chemistry.
- Also, use the grassroots extremists charges against the role of science in shaping public policy as a call to arms within the professions whose credibility and relevancy are at stake.
- . . . Urge the Vinyl Institute to begin immediately to build alliances on the PVC issue, beginning with those with an obvious economic stake, e.g., home builders, realtors, product manufacturers, hospitals and others who are immediately targeted.
- Form an alliance on PVC issues with the Mid-States Oil and Gas Association which is concerned about expansion of the activist anti-PVC program in the Gulf of Mexico and is seeking allies in the chemical industry. . . .
- Bring the state governors in on the issue of risk assessment by communicating the benefits to them from being able to rely on a national standard.
- Establish third-party entities devoted to developing these standards in the near future.
- Take steps to discredit the precautionary principle within the more moderate environmental groups as well as within the scientific and medical communities. . . .
- It is especially important to begin a program directed to pediatric groups throughout the country and to counter activist claims of chlorine-related health problems in children. . . .

Prevent Medical Associations from Joining Anti-Chlorine Movement

- Create panel of eminent physicians and invite them to review data regarding chlorine as a health risk and as a key chemical in pharmaceuticals and medical devices.
- Publish panel's findings and distribute them widely to medical associations and publications.
- Stimulate peer-reviewed articles for publication in the [*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 their resolutions to medical societies. . . .

NWF Says Chlorine is a Threat to Human Reproduction

One of the most significant recent developments in the anti-chlorine campaign is the National Wildlife Federation's (NWF) publication of *Fertility on the Brink*, which attributes fertility and reproductive problems to exposure to chlorine-based chemicals. The report depicts widespread and devastating effects on the reproductive, endocrine and immune systems of humans and animals as a result of exposure to an environment permeated with chlorine-based chemicals. The NWF uses the issue of fertility as a vehicle to play on the emotions of the public and its concern for future generations. . . .

The NWF is highly respected by mainstream environmentalists, conservationists, industry and government. That respect combined with the vast resources NWF controls, provide the NWF substantial influence on national policy decisions related to environmental and conservation matters.

The NWF printed 1,000 copies of *Fertility on the Brink*, which is almost depleted and a second printing is expected. . . . The publication of and demand for *Fertility on the Brink* may signal that the claims of destructive health problems attributable to toxic exposure has become more widely accepted by the public and will probably become a larger issue. . . .

Risk Assessment Based on the Needs of Children

Anti-chlorine activists are also 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. The tactic also is effective in appealing to an additional segment of the public which has yet to be activated in the debate, particularly parents. . . .

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 lowest possible levels. . . .



Eagles and peregrine falcons are among the species endangered by use of DDT and other chlorine-based chemicals, which include dioxins, PCBs and Agent Orange.

Dioxin and Risk Assessment . . .

Anti-chlorine groups will probably devise tactics which promote the adoption of the "precautionary principle." The principle, which shifts the burden of establishing a chemical's safety to industry, is unlikely to be adopted. The debate over the "precautionary principle" will elevate the dioxin issue to a more conspicuous level. . . .

This is a critical time for the future of risk assessment as a tool of analysis. The industry must identify the implications posed by the "precautionary principle" and assist the public in understanding the damage it inflicts on the role of science in modern development and production. . . .

Breast Cancer, Fertility and Reproductive Problems Caused by Pesticides . . .

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) helps validate her "junk science." Davis is scheduled to be a keynote speaker at each of the upcoming . . . breast cancer conferences . . . sponsored by Women's Economic and Development Organization (WEDO). . . . Each conference is expected to emphasize a regional interest. . . . Topics include "Environment and Breast Cancer," "Organochlorines, Pesticides and Breast Cancer" and "Environmental Justice."

MBD: Mission Despicable

Have you ever wondered what it's like to talk to a spy? The experience is quite a bit less dramatic than the scenarios you see in *Mission Impossible*, according to activists who have recently been targeted by phone calls and other information-gathering efforts.

The field operatives who gather information for Mongoven, Biscoe & Duchin are typically polite, low-key and

do their best to sound sympathetic to the people they are interrogating. They have misrepresented themselves, claiming falsely to be journalists, friends of friends, or supporters of social change. Most of the time, however, they simply give *very* limited information, identifying their company only by its initials and describing MBD euphemistically as a "research group" which helps "cor-

RACE-BAITING STRATEGY HELPS KEEP SHELL PUMPING IN NIGERIA

Shell Oil and Nigeria's military dictatorship are using a black-against-black "divide and confuse" PR strategy to deflect criticism following Nigeria's executions of writer Ken Saro-Wiwa and eight other environmental and human rights activists.

Their approach resembles the "Neptune Strategy" developed a decade ago by Jack Mongoven's former PR firm to defend Shell's dealings in South Africa.

Following the hanging of Saro-Wiwa in November of last year, Shell and Nigeria each launched separate massive PR campaigns claiming that they are participating in a "transition to democracy" in Nigeria.

Nigeria's \$10.7 million campaign employed eight U.S. PR firms whose work included production of a 297-page book and a three-part TV documentary, plus advertisements targeting Washington policymakers. The regime funded a "fact-finding" junket of black journalists who visited Nigeria and reported back with accolades for Nigeria's ruler, General Sani Abacha. Abacha's government also bought glossy, multi-page color insert ads in black newspapers, claiming that criticisms of Nigeria are racist, "double standard treatment of Black African Nations by the United States government. If Jewish Americans can stand up for Israel we can stand up for Africa."

These efforts to enlist black support for a dictatorship that oppresses blacks are reminiscent of the 1987 "Neptune Strategy" used to counter a boycott against Shell's business dealings in apartheid South Africa.

The Neptune Strategy was developed by Pagan International, whose partners included Jack Mongoven, Alvin Biscoe and Ronald Duchin. Pagan International organized and subsidized a group composed of black clergy called the Coalition on Southern Africa (COSA), which countered calls for Shell to divest its South African holdings by talking instead of ambitious plans to promote education and training of South African blacks and develop black-black business links between South Africa and the United States. In real-

ity, COSA was a deceptive paper front group with no resources to carry out these goals.

IT'S THE ECONOMY, STUPID

Following the recent executions in Nigeria, Shell has turned again to the argument that its African business activities are creating economic progress for black Africans. Its PR campaign has included full-page ads in European, American and South African newspapers, claiming that thousands of Nigerians would lose job opportunities if the company abandons its plans there to build a \$4 billion liquified natural gas plant.

Shell is in fact Nigeria's largest foreign investor, earning over \$312 million a year in profits from its oil operations. Ken Saro-Wiwa was the most vocal advocate for Nigeria's Ogoni tribespeople, who claim that Shell's activities are destroying their communities.

Defending Shell's failure to prevent the executions of Saro-Wiwa and the others, the company's ads criticized "campaigning groups" who "say we should intervene in the political process in Nigeria. But even if we could, we should never do so. Politics is the business of governments and politicians."

These arguments drew sharp criticism from Ken Saro-Wiwa's younger brother, Dr. Owens Wiwa. "Shell is involved in Nigerian politics up to their neck," he said. "If they had threatened to withdraw from Nigeria unless Ken was released, he would have been alive today. There is no question of that."

Owens Wiwa described his own meetings with Brian Anderson, head of Shell's Nigerian operations. According to Owens Wiwa, Anderson offered to use his influence to help Saro-Wiwa if international environmental groups would stop their protests against the company. Owens Wiwa said Anderson promised "to get Ken and the others freed if we stopped the protest campaign abroad. I was very shocked. Even if I had wanted to, I didn't have the power to control the international environmental protests." ■

porate decision makers . . . develop a better appreciation of the public interest movement" in order to "resolve contentious public policy issues in a balanced and socially responsible manner."

MBD performs its services by pumping members of activist groups for information about their philosophical beliefs, funding sources, organizational structure and affiliations, and names of key personnel. Information only gets shared in one direction, however. "Our relations with our clients are confidential," stated MBD President Jack Mongoven in a June 7, 1995 memo refusing *PR Watch's* request for a list of MBD's corporate clients.

MBD says it is "grateful" when activists "cooperate" by answering its information requests, but don't expect the company to show its gratitude in any meaningful way, such as sending you a copy of the reports it writes about you. Those reports will be stamped confidential and delivered only to MBD's clients, who pay as much as \$9,000 per month for the privilege of seeing them. Otherwise, MBD's "research" only sees the light of day on the rare occasions when a conscience-stricken corporate employee decides to turn whistleblower.

DIALING FOR DOLLARS

Environmental activist Paul Orum reports receiving a call on June 3 from MBD employee Emily Frieze, who "was interested in finding out about the environmental community's activity to keep ethylene glycol on the list of right-to-know chemicals (the Toxics Release Inventory, or TRI)."

Ethylene glycol is used in making common antifreeze. It is a highly toxic poison which is especially dangerous because of its enticingly sweet taste and smell. As little as two teaspoons of antifreeze can cause death or blindness, and every year it claims the lives of children and pets who drink it by accident.

Currently, antifreeze makers are petitioning the U.S. Environmental Protection Agency to take ethylene glycol off the TRI list, a petition which which has drawn written opposition from dozens of environmental groups.

Orum says that Frieze did not go out of her way to identify her employer during her interview with him, but she did not overtly misrepresent herself either. "She identified herself as with 'MBD' when asked. . . . I asked her if MBD was working for the ethylene glycol manufacturers. She implied yes, and said MBD likes to keep up with what's going on."

Another environmentalist, Ann Hunt, reports receiving a similar call on May 23 from "a woman who identified herself as Tanya Calamoneri." Hunt is executive director of Citizens for Alternatives to Chemical Contamination (CACC), a Michigan group located near the

corporate headquarters of Dow Chemical, a leading producer of toxic chemical compounds.

Calamoneri asked Hunt to send her a list of the conference materials from "Backyard Eco Conference '96," an annual CACC-sponsored event. "She gave a DC address on Connecticut NW," Hunt says. "Knowing that there are a lot of nonprofits in that area, I asked which group she represented. Her response was 'MBD,' which she characterized as a public policy and research consulting group. I later learned that it was Mongoven, Biscoe and Duchin, chief consultants and dirt-diggers for the Chlorine Chemistry Council. . . . It amazes me that the forces of darkness are that interested in what a little grassroots group in central Michigan is doing. Certainly an indication of our collective power!"

In fact, MBD's interrogatory net spreads worldwide. Bob Burton, the coordinator for Wilderness International in Tasmania, Australia, reports receiving a letter dated January 25, 1995 from Bartholomew Mongoven (Jack's son), seeking "assistance in a significant research undertaking" to "promote improved understanding and cooperation between major businesses and consumer- and environmentally-oriented interests throughout Asia and the world."

To assist in this research endeavor, Mongoven asked Burton to fill out a detailed questionnaire. Burton, however, is a *PR Watch* subscriber. He promptly alerted other environmental groups in Australia and neighboring countries to beware of MBD's true purposes. He also provided *PR Watch* with copies of his correspondence with MBD, which we are reprinting below:

1. Letter dated January 25, 1995

Executive Director
The Wilderness Society
1A James Lane
Sydney, NSW 2000, Australia

Dear Sir or Madame,

We kindly invite your assistance in a significant research undertaking. We believe it can ultimately promote improved understanding and cooperation between major businesses and consumer- and environmentally-oriented interests throughout Asia and the World.

I am writing to you on behalf of Mongoven, Biscoe & Duchin (MBD), a Washington, D.C. management consulting group. Since its establishment in 1988 MBD has endeavored to help its clients improve their sometimes meager or naive understanding of public interest groups, especially those non-governmental organizations (NGOs) concerned with environmental and consumer affairs.

MBD is committed to the concept that it is critical to know who the current and potential participants are in the public policy process. MBD has developed extensive contacts