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Activist Update Chlorine —

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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 Washington, D.C.. Its national field director is Jeanna Collins, who is closely associated with various Nader operations. The group's type of activist training tends to be typical of U.S. PIRG and its affiliate state PIRGs, with something of a paranoid, anti-corporate form of activism. It is specifically directed at college students and recent college grads.

Green Corps, which is very active on college campuses because of its affiliation with state PIRGs, has just recently begun its current recruiting drive with ads directed to recent graduates that emphasize activism on water issues, some of which specifically mention chlorine and the pulp and paper industry.

The group 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. U.S. PIRG and NRDC were two of the major groups--along with Greenpeace and the Sierra Club--which joined last February in support of the International Joint Commission's Report on Great Lakes Water Quality that called for the phase-out of production and use of chlorine-based compounds.

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, D.C., 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. The campaign against the pulp and paper industry's use of chlorine is only a small part of what CWN members expect will become a multi-pronged attack on chlorine chemistry.

The network, headed by NRDC's Robin Roberts, coordinates a number of anti-chlorine activities, some of which are only tangential to water issues. 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. Green Corps' new recruits and U.S. PIRG's affiliates on campuses will certainly play a key role in that strategy.

Green Corps has four other offices around the country and 20 organizers who recruit and train recent college graduates in environmental activism. This year, the organization's Princeton, N.J. office is concentrating on recruiting and training activists in clean water and anti-chlorine issues. One entire section of the program is dedicated to anti-chlorine/dioxin activism, especially against the pulp and paper industry. Much of the material the project is using is based on Greenpeace's campaign against the pulp and paper industry in the Southeast U.S..

Green Corps plans to expand its training to cover other areas of chlorine usage. Because of U.S. PIRG's broad-ranging opposition to chlorine chemistry, Green Corps can be expected to follow its lead and expand its efforts from pulp- and paper-related clean-water issues to PVC, pesticides and a host of other chlorine chemistry products, particularly in connection with solid waste issues and incineration.

Although Green Corps says it does not work directly with Greenpeace, it admits that both U.S. PIRG and Green Corps take many of their cues from Greenpeace. Greenpeace is also a major player in the Clean Water Network and has been using the network to sell its line on chlorine in an effort to broaden and diversify its attacks.

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.

Green Corps is also affiliated through U.S. PIRG with another Nader operation called The Fund for Public Interest Research which collaborates closely with the Sierra Club and NRDC on other projects.

Essentially, all the Nader operations that recruit and train young people to become activists follow the same pattern. The training is a combination of classroom teaching that "combines organized theory with disciplined practice in the field, working one-on-one with senior staff."

Students are taught strategies that include lobbying techniques, media manipulation, how to use litigation and how to produce credible-sounding research reports and other activist techniques. The indoctrination in the issues is intense and new recruits are expected to

work about 12 hours daily.

Green Corps' new recruits will be paid \$15,000 to \$18,500 in their first year, plus medical insurance, college loan assistance and other benefits. After summer training, the recruits are placed as field organizers, canvass office directors or in other positions.

One of the positions--canvass office directors--is typical of Naderite job descriptions; it is described as having responsibilities that include running "a regional campaign office. Hire, train and supervise a staff of 15-25 to conduct door-to-door membership drives. Organize coalitions. Start consumer boycotts. Run petition and letter writing drives. Generally raise hell."

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In conjunction with this effort, U.S. PIRG and its allies in CWN are planning to intensify the activity against chlorine chemistry on college campuses. The state PIRGs, which operate mainly around universities and include many faculty members, are given several issues each semester to rally support for U.S. PIRG's positions. AS U.S. PIRG, NRDC, the Sierra Club and others intensify and broaden the scope of their attack on chlorine, they will certainly look to college campuses for manpower and support.

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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 EPA study, intended to review and assess the scientific evidence that dioxin is a proven carcinogen failed to find such carcinogenicity. Since the study indicates that there may be a linkage of dioxin and birth defects or negative impact on the human immune system,

activists maintain that they were right in their campaign against dioxin all the time.

The dioxin reassessment began in 1991. Greenpeace began its U.S. anti-chlorine campaign based on potential birth defects in late 1992. It is unknown whether Greenpeace was aware at that time of the direction the reassessment was taking.

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 re-assessment 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 phaseout 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 manufacture 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 phaseout all other chlorine-based processes.

Greenpeace called on the World Health Organization (WHO) to change its daily allowable intake of dioxin to zero. The WHO's 10 picograms/kilograms/per day guideline is 1,000 times greater than the current U.S. EPA standard of .0006 picograms/kilograms/per day.

"With this report, the U.S. EPA is likely to reduce their (sic) allowable level of dioxin even further, thus exposing the WHO standard as completely outdated and a grave threat to human health," said Dr. Paul Johnston of Exeter Laboratory in the UK. 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.

In response to this data, Greenpeace called on the U.S. EPA, the WHO and governments worldwide to adopt a "Zero Discharge" standard for dioxin. 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.

Greenpeace is urging regulatory authorities in the U.S. and Canada to take emergency action on the three largest dioxin sources:

- **Incinerators**

All waste incinerators should immediately be shut down or prohibited from burning ANY chlorinated chemicals. The EPA identified "combustion units" as the largest known sources of dioxin, with incinerators for hospital waste, municipal trash, and hazardous waste topping the list.

- **Pulp Mills**

Pulp mills should be placed on enforceable timelines to eliminate the use of chlorine and chlorine- based bleaching agents. The EPA identified chlorine-bleaching pulp mills as the next largest dioxin source and the most important discharger into waterways. The North American paper

industry should be directed to adopt totally chlorine-free, oxygen-based bleaching now in use at many mills in Europe, rather than chlorine dioxide which still resulted in dioxin formation, though in reduced amounts.

- **PVC Plastic**

The use of PVC plastic should be immediately restricted and timelines developed for its total elimination. PVC the largest use of chlorine and is the major chlorine source in most types of incinerators and is associated with more dioxin formation than any other product. Large quantities of dioxins are formed when PVC is manufactured, when PVC products are burned in incinerators or accidental building fires, and when PVC-containing metal products like cables and cars are recycled at high temperatures.

Greenpeace says the EPA's study also indicated that there is no safe level of dioxin exposure and that any dose -- no matter how small -- can result in health damage. New findings on the mechanism of dioxin toxicity shows 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 defenses against infectious disease.

"The EPA's findings confirm that current levels of dioxin pollution represent a public health emergency," said Jay Palter of Greenpeace. "These findings add further support to the repeated calls to phase out industrial chlorine uses made by international scientific and public health bodies."

Greenpeace said the study pointed to improved scientific objectivity in the U.S. EPA, but it cautioned that the report does not yet specify the agency's policy responses. Greenpeace called on the U.S. EPA to act strongly to address the dioxin threat despite industry pressure that is sure to come, and to set an example for governments worldwide in order to protect human health.

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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. Fishbein explained in a recent conversation that INFORM has always encouraged source reduction rather than the end-use of a product. However, she indicated that the findings in the reassessment would be useful to support the group's work on source reduction. Fishbein also explained that the dioxin reassessment will play a role in INFORM's work with the state of New York in developing environmentally-preferable procurement guidelines, particularly for chlorine-bleached paper.

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.

INFORM's expertise in solid and hazardous waste issues, which is widely acknowledged by environmental groups at both the national and grassroots levels lends a great deal of weight to its policy positions. It is probably the leading group on incineration issues.

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.

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Cattlemen form industry group on dioxin

The National Cattlemens 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.

The meeting focused on EPA's failure to have the entire draft of the dioxin reassessment report peer-reviewed before releasing it publicly. NCA and other industry groups stressed the importance of releasing the report "in a responsible manner," not through leaks to the press. 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."

One representative--from a large agricultural organization--said it appeared to him that there was a "strong possibility" that the last chapter in the dioxin reassessment report that deals with risk assessment was written by Greenpeace or Ellen Silbergeld, not by EPA staff.

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 study was originally looking at adipose tissue, liver and plasma or serum levels from a total of 65 bulls and cows in 12 sites. NCA criticized the protocol for not including muscle tissue. After outlining its concerns to USDA, the longissimus dorsi muscle (ribeye) was added to the protocol. NCA and USDA researchers expect to see very little dioxin in the muscle because dioxin accumulates in fat.

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 CMA 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--the statistics on noncancerous effects of dioxin is based mainly on animal data.

The working group has laid out three elements for an issue management strategy:

1. Continue working with industry groups to refine political and media strategies.
2. Continue discussions with EPA, USDA and the Hill to ensure only a responsible release of information.
3. Keep affiliates informed of events and provide talking points as needed.

NCA and its allies in the working group have a history of strong relations with the Agriculture department and its 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.

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Second Citizen's 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. Speakers include, Dr. Richard Clapp, Dr. Barry Commoner, Ellen Connett, editor Waste Not; Joe Thornton, Greenpeace; Pat Costner, Greenpeace; Joan D'Argo, Greenpeace; Charlie Cray, Greenpeace; Lois Gibbs, Citizens Clearinghouse for Hazardous Waste (CCHW); Mick Harrison, Government Accountability Project; Marilyn Leistner, last Mayor of Times Beach; Jim Mueller, Citizens to Save Our Environment; Dr. Peter Montague, Rachels Hazardous Waste News and Tom Webster, EPA Reassessment Review Panelist.

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." Marilyn Leistner will chair a discussion of "What really happened at Times Beach?" 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." A bus tour of the planned Times Beach incinerator site is being organized, after which there will be a reunion of residents of Times Beach and other Missouri locations allegedly contaminated with dioxin in the 1970's.

Dr. Paul Connett will discuss his report on government decisions concerning dioxin and incinerators and what the reassessment means for grassroots organizing. Other reports will be presented concerning dioxin and incineration issues from North America and Europe.

The concluding session will focus on two types of "successes:" (1) citizens' halting incinerators, and (2) businesses which have adopted positive industrial processes. The conference will end on a note that it is possible to replace incineration with non-toxic processes of production.

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NWF charges Mineta bill will weaken CWA

The National Wildlife Federation (NWF) is "strongly opposed" to a House of Representatives' attempt at rewriting the nation's clean water legislation, saying the proposal "significantly weakens current law in critical areas."

NWF says it will work with the House Public Works and Transportation Committee Chairman Norman Mineta (D-CA) and other committee members to restore environmental safeguards to the bill, H.R. 3948.

"This legislative proposal flies in the face of current science and is a clear retreat from past efforts to help protect all Americans from the devastating health effects linked to the discharge of toxic chemicals into our nation's waters," said William H. Howard, NWF Executive Vice President.

Specifically, NWF says three major provisions of the present bill are unacceptable:

- the bill fails to address the discharge of dioxin and other chlorinated compounds. These chemicals are scientifically linked to increased breast, prostate and testicular cancer and to endometriosis, low sperm count and deformed reproductive organs. H.R. 3948 fails to adopt President Clinton's proposal to form a task force to study this issue in four key industries and follow up with enforcement where warranted.
- EPA authority to regulate toxic discharges into the nation's water. H.R. 3948 actually weakens the EPA Administrator's current general authority to regulate toxic chemicals. H.R. 3948 adds both cost/benefit and comparative risk assessment criteria in setting what should be purely health-based toxic effluent standards.
- the bill severely weakens current wetlands law, undermining Section 404--the heart of the wetlands program--by opening up a whole host of new loopholes for agriculture and others. H.R. 3948 would replace current wetlands policy (i.e., avoid wetland destruction wherever practicable) with expensive, time-consuming procedures favoring development over conservation.

"We will continue to work with the Committee to produce a bill that includes strong environmental protections," Howard added. "But, industry-backed special interest groups representing the chemical, oil and gas agricultural and real estate industries have had their way with certain members of this committee. We promise to do everything we can to change this bill in order to protect the health of all Americans as well as the environment."

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Greenpeace assails cluster rule standard for chlorine bleaching

Greenpeace says the Environmental Protection Agency's draft "cluster rule" for the pulp and paper industry is a pollution reduction measure which may become an "obstacle to pollution prevention."

"The proposed standard takes the industry from chlorine to chlorine-lite, when the industry needs to be chlorine-free," said Mark Floegel of Greenpeace's Chlorine Campaign. Greenpeace maintains that because chlorinated pollutants persist in the environment, the only solution is to "eliminate the use of all chlorinated chemicals and prevent the pollution from occurring."

"Chlorine-free technology exists and is being used by our overseas competitors; we should be using it here," Floegel said, adding that "the use of chlorine dioxide by the U.S. paper industry will leave us environmentally blighted and economically uncompetitive."

Greenpeace maintains that the paper industry will have to make significant investments to shift to chlorine dioxide, which it says is an "already obsolete technology." Floegel said that since the move to totally chlorine-free technology is inevitable, why make the industry spend money twice? Greenpeace recommends that the EPA "mandate totally chlorine-free technology for all sectors of the paper industry now."

Greenpeace says that the "cluster structure" of rulemaking is sound, in that it prevents media shifting by polluters. "However, the cluster only works when the standard it sets is truly protective of human health," Floegel said. In other words, it is only sound when it suits Greenpeace's purposes.

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U.S. PIRG to check out Dow and CMA

Ralph Nader's Washington, D.C.-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."