

Message

From: PEIRCE, BOB [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=819117]
Sent: 7/30/2008 1:40:40 PM
To: YOUNG, GLYNN [AG/1000] [glynn.young@monsanto.com]; MITCHELL, BRADLEY C [AG/1000] [bradley.c.mitchell@monsanto.com]
CC: COMBEST, JOHN C [AG/1000] [john.c.combest@monsanto.com]; KASPER, GARRETT D [AG/1000] [garrett.d.kasper@monsanto.com]
Subject: ACC detailed summary of Poisoned Profits
Attachments: Poisoned Profits ACC Summary of Book.doc; Poisoned Profits ACC Comm Plan.doc

I have attached a detailed summary of the book, Poisoned Profits, prepared by the ACC and provided by an acquaintance from a chemical company. We also expect, from the ACC, a copy of the book sometime this morning.

The book names a myriad of chemicals that threaten children's health and brings up most of the major chemical industry issues of the last decade. So, there is a crowd of targets. The book's theme is the "frightening and expanding dimensions of children's chronic illnesses in the U.S.," blamed on chemicals. The book takes the chemical industry to task for lobbying efforts, public relation efforts (including Responsible Care), industry-sponsored science aimed at "creating doubt" which allows the "manufacturer to mischaracterize fundamental policy conflicts over protecting health as, instead, disagreements over science." (And, we don't like their scientists, so...)

In terms of Monsanto, the company is criticized for manufacturing aspartame, Alachlor (Lasso), rBST, agent orange and 2,4-D (sic). The authors state that "there is mixed evidence about the dangers of all these products and Monsanto has defended them as safe. But there is sufficient body of research to suggest that they all can present potent health risks particularly to children."

The ACC summary does not mention references to Anniston and PCB's, saying that GE is blamed for its handling of PCB's. However, the Web site promoting the book does mention Anniston. FYI, Anniston is still active, with health studies being done on residents of that community related to PCB health issues.

I've also attached the current ACC communications plan. ACC seems to be adding a great deal of value on this issue. CropLife, so far, does not appear to be on top of this issue. I, for a vote of one, recommend that we re-establish a formal relationship with ACC that allows us to work hand in hand with this organization in the weeks ahead. The summary of the book labels it for internal use only.

On the legacy issues, there is a two-hour meeting scheduled for Thursday with Robert Kalay, to determine what we can say about PCB's, Agent Orange and dioxin. Going with the crowd on the legacy issues probably is preferable if possible. The rBST is another issue. It is lumped in with the other chem issues.

Bob

SUMMARY OF

Poisoned Profits - The Toxic Assault on Our Children Philip Shabecoff and Alice Ahabecoff (2008)

FOR INTERNAL USE ONLY – NOT FOR EXTERNAL DISTRIBUTION

Executive Summary

Poisoned Profits is marketed as revealing the “frightening and expanding dimensions of children’s chronic illnesses in the U.S.” and the authors are said to “definitively link this epidemic to industrial toxins.” The book indeed argues that children are exposed to a vast array of chemical pollutants which are linked to or causing a variety of health ailments, that the chemical industry is to blame, and that the government has failed to step in and act to protect children.

The authors have sought to structure the presentation as a “crime story” from the standpoint of a prosecuting attorney “pointing at those responsible” for the “toxic assault” on children and their abettors (p xiii). Accordingly, chemical-specific attacks are woven throughout the book, but appear to be presented primarily as support for the authors’ general arguments (rather than intended as direct attacks at any particular compound). Marketing materials call two stage-setting stories about Dickson, Tennessee (TCE) and Port Neches, Texas (butadiene) “piercing case histories.”

The primary chemicals highlighted throughout the book, to the extent that the authors single any out for special treatment, are trichloroethylene (TCE), phthalate esters generally, bisphenol-A, PFOA, butadiene, pesticides generally, methylmercury, DDT, PCBs, dioxin(s) generally, triclosan, perchlorethylene, PVC/chlorine, Dursban, Atrazine, and formaldehyde.

Virtually every attack that has been made on the chemical industry in the last decade is trotted out in the book. Among other things, the book faults the operation of TSCA; praises REACH; argues in favor of the application of the precautionary principle; and argues that industry-funded science is inherently tainted. The book claims that there is a “revolving door” between industry and government (p. 161). Chapter 9, *Witness for the Defense*, argues that the chemical industry has adopted the tactics of the tobacco industry – as carried out by the Weinberg Group – of “creating doubt” which allows the “manufacturer to mischaracterize fundamental policy conflicts over protecting health as, instead, disagreements over science (p. 172).

The arguments and examples presented, however, are largely if not entirely regurgitated from other sources. There appear to be no new illustrations that have not already been presented by NGO campaigns, in litigation, or by environmental activists elsewhere.

The book is not presented in journalistic fashion; on no occasion does it attempt to present a balanced case (there are strikingly few concessions, which stand out for their rarity, e.g.,: “[c]hlrorine-based chemicals have created a cornucopia of useful

products that have been of great benefit to human society” (p. 137)). Virtually all of the authorities cited are well-known activists or others engaged regularly with the environmental community, e.g., Philip Landrigan, Ted Schettler, Richard Clapp, Jacqueline Warren; Jay Feldman, Bruce Lanphear, Eric Schaeffer, Lois Gibbs, Ellen Silbergeld, Ken Cook, Theo Colborn, and John Peterson Myers. The book functions as a one-sided assault on the chemical industry and chemicals.

The authors also make various statements that do not appear to have been well-researched or fact-checked, and may have been lifted wholesale from NGO materials. For example, they claim that “most” of the chemicals entering the environment have not been tested for “the full range of toxicity to humans” (p. 18). Bisphenol-A is called a “plastics softener” (p. 59). There are also a number of shocking if not outrageous speculations/assertions, such as “Is it possible that toxic chemicals contributed to the violence in schools such as Columbine and Virginia Tech? Many of the places where students who committed these terrible crimes lived are near toxic waste dumps or like Columbine, are toxic military bases” (p. 124).

Chapter 7, entitled *Perpetrators*, castigates a number of specific companies. GE is blamed for its handling of PCBs (pp. 126- 135). Monsanto is charged with having manufactured aspartame, Alachlor (Lasso), bovine growth hormone, agent orange and 2,4-D. The authors state that “[t]here is mixed evidence about the dangers of all these products and Monsanto has defended them as safe. But there is a sufficient body of research to suggest that they all can present potent health risks, particularly to children” (p 136). Dow Chemical, along with chlorine chemistry, receive substantial criticism – “chlorine chemistry also produces many compounds that are among the most toxic and dangerous known to science” (p. 137); see section entitled *A Kingdom Based on Chlorine*, pp. 137-141 (discussing Dursban and Lorsban); and *Trouble in Toms River*, pp. 141-144 (the latter discussing Union Carbide and Ceiba-Geigy plants). DuPont is singled out at pages 144-147 including discussion of PFOA). The Chapter notes that the “list of perpetrators” is not limited to GE, Monsanto, Dow, and DuPont, but “could include many that have placed high volumes of toxics into the environment, including BASF, Velsicol, American Cyanamid, Hoechst, and others.”

The book concludes with a variety of suggestions for how parents can reduce the exposure of their children to various chemicals in an appendix. This appendix will likely be widely reproduced and cited.

Highlights of Selected Chemical-Specific Discussion

TCE

The entire introductory chapter, *Inquest*, is devoted to retelling the story of groundwater contamination in Dickson County, Tennessee by TCE. The authors point to a “cluster” of cleft palates in newborn children over a short period of time, as well as a rare brain malformation in two babies and a “large number of hypospadias,” a high incidence of heart problems, and “childhood leukemia” in an undisclosed number of children (p.5). Local citizens suspected that something in the county landfill was leaching into their groundwater and causing the health effects. Government tests detected benzene, toluene, xylene, and trichloroethylene (TCE) in undisclosed concentrations in county groundwater (p. 6). The presence of TCE in the groundwater is largely blamed on Scovill-Schrader, an automotive parts manufacturer (pp. 6-7).

Chapter Two begins by drawing an analogy between the Dickson County children with birth defects and the victims of a crime (pp. 15-16). The authors then discuss how Dickson could be any community in the United States (p. 16).

Butadiene

The book describes Port Arthur/Port Neches, Texas and suggests incidences of cancer and other health effects are linked to butadiene (“the [football] field was also near a plant that had been the biggest producer of butadiene in the country” (p. 26, see also discussion pp. 25-29).

Phthalate Esters

“School age children carry a burden of about one and one-half times more than adults of a family of chemicals, called “phthalates,” used in plastics and cosmetics” (p. 46).

“Among the body of evidence are conclusions of a competing nature. Some studies will claim they have uncovered harm, countered by other evidence claiming benignity. Such is the case surrounding phthalates, accused as an agent of reproductive deformities among male babies – an accusation disputed by industry. Though the family of phthalates was invented in the 1930s, the federal government began to support research into their effects on human research only in 1999 (p. 61).

“In the eye of the storm stands Professor Shanna Swan, a professor of obstetrics and gynecology at the University of Rochester Medical Center. Trained also in epidemiology and statistics, she recently launched the Study for Future Families to track reproductive health over the years to come. She is one of the scientists who definitively documented declines of 1 percent a year in sperm count since World War II in the United States and Europe. It was her research that discovered that lower sperm quality in U.S. men can vary from one area and environment to another and that lower sperm quality in the agricultural Midwest may be due to exposure to pesticides” (pp. 61-62).

“In 2005, Dr. Swan published the results of a landmark study of phthalates funded by EPA and the National Institutes of Health. She and her colleagues found that among the eighty-five mother-son pairs they studied, women whose urine during pregnancy carried higher levels of traces of phthalates were more likely than the others to have baby boys with genital conditions, including smaller penises and a shorter distance between the genitals and the anus. In studies of male rodents, the distance is usually about twice as long as in females, so a shorter distance is thought to indicate the “undervirilization” of males. Boys with this shorter distance were also more likely to have incompletely descended testicles” (p. 62).

“The American Chemistry Council’s Phthalate Information Center, a group representing the manufacturers, counters that phthalates “make everyday life more convenient, colorful and fun” and that human exposure is well below the EPA safety margin. The head of the council’s phthalates panel argues that differences in genitalia have no known significance in humans and could be caused by natural variability” (p. 62).

“The National Toxicology Program’s Center for the Evaluation of Risks to Human Reproduction, refereeing the debate, concluded that evidence of harm to adults was still insufficient, then expressed “concern” for infants and “some concern” for toddlers, strong language for this research body. It stated that if infant and toddler exposure were severalfold higher than that in adults, male reproductive tract development would be adversely affected. Then the center added information showing that’s exactly the situation: “Exposure of children one to six years old has been established to be several-fold higher” because of their smaller bodies and immature metabolic systems. The most recent CDC survey of Americans’ body burdens in fact found that eleven of twelve phthalates were higher in children than in adults” (p. 62).

“The baby awakens in her room, arguably the most toxic room in the home...If she’s chewing on a Little Teethers teething ring, she’s ingesting some phthalate molecules, a chemical used to soften plastics, though if it’s a Soft Freezer Teether, it’s free of phthalates....If the baby takes along her rubber ducky or the Splish-Splash Jesus bath book to her bath, both expose her to another dose of phthalates. (Phthalates, like flame retardants, disrupt the body’s hormones.) In the bathroom, the distinctive, unpleasant smell of the new vinyl shower curtain means it’s offgassing more phthalates and other unwanted chemicals. Air fresheners may be emitting a lemony and pine smell; the scent derives not from lemons or pine needles, but from [a variety of chemicals] and more phthalates....Getting ready for the day, as you apply makeup and perfume or shave, you encounter more phthalates, there to disperse the scent evenly so that it lasts longer. After you rub a product with phthalates into your skin, the chemical will pass straight into your body and, just two hours later, show up in your urine....Phthalates are recognized as toxic substances under the major U.S. law controlling industrial chemicals, but “companies are free to use unlimited amounts in cosmetics,” the [Environmental Working Group] points out (pp. 68-69).

A baby born prematurely “could have been exposed to twenty times more [of DEHP] than the FDA standard. Dr. Ted Schettler...notes that cost-competitive medical products without phthalates are readily available and already in use by a number of prominent medical supply manufacturers and hospitals... (pp. 69-70)

“In the refrigerator, food is probably stored in plastic containers, yet another everyday household item often made of polyvinyl chloride (PVC) with phthalates. After your ten-year-old daughter microwaves leftover mac-and-cheese in a plastic bowl covered with plastic wrap, she may ingest a double portion of phthalates in her quickie meal. Her Barbie doll is made of PVC plus phthalates. If you are expressing breast milk to give later on to your baby, the pump probably contains one of the phthalate chemicals....If a container is microwaved or refrigerated, the molecules may migrate into any high-fat food, such as milk, meats, and cheeses, stored there. Dr. Donald T. Wigle, epidemiologist and author of the textbook *Child Health and the Environment*, says he even slices off a thin layer of whatever food came into contact with plastic wrap. Some plastic wraps are made with phthalates or another type of softener that leaches, some are not. Glad Cling Wrap contains no softener, and S.C. Johnson reformulated Saran Wrap without any phthalates” (pp. 70-71).

“Phthalates, bisphenol-A, dioxins, flame retardants, and some pesticides, as well as long-banned chemicals persisting in the environment, such as DDT, are major hormone disruptors” (p. 97).

“For example, testicular cancer, poor sperm quality, and male genital tract malformations – where the urethra is in the wrong place in the penis or where testicles fail to descend – are now seen as related. The likely explanation is that fetal exposure to hormone-disrupting pesticides, phthalates, flame retardants, and other chemicals causes permanent abnormal development of cells within the fetal testes, which disrupts the normal, healthy unfolding of development....(p. 105).

“Studies can choose to look at lab animals at a stage of their life when harm is less likely to occur. In an industry study of phthalates, researchers reported that no effect occurred to marmosets exposed and then examined when they were already in puberty. But with these chemicals “it’s the developing organism that’s affected,” Dr. Ted Schettler explains. Or scientists can literally bury the evidence, as Dr. Schettler found when, after obtaining the raw data under the Freedom of Information Act, he discovered that the animals that showed any impacts had been discovered” (p. 180).

Bisphenol A

“Only in the past ten years have studies begun to look at the possible connections between cancer and about twenty synthetic chemicals, notably pesticides, PCBs, dioxin, the plastics softener called bisphenol-A, and solvents” (p. 59).

Solvents also increase the risk of spontaneous abortion, as do hormone-disrupting chemicals from phthalates to bisphenol-A, from dioxin to PCBs” (p. 61)

“Getting ready for school, your daughter puts on a T-shirt with a shiny printed design and fills her bright blue Nalgene water bottle, which she tucks into her backpack. The snazzy-colored Nalgene bottle and other hard (#7) polycarbonate plastic bottles harbor a different plastics ingredient, a molecule called bisphenol-A that was originally invented in 1936 as a synthetic estrogen. (We now know the damage that can be caused by hormone replacement estrogen.) The plastic is used

in most polycarbonate baby bottles, in toddler sippy cups, and in some reusable and microwavable food and drink containers, such as Rubbermaid's Dip'n Snack Tray. The five-gallon jugs that hold "pure spring water" are made of polycarbonate. Bisphenol-A is also usually found in the plastic resins that line food cans, supply pipes, and even dental sealants used on kids to prevent cavities. The chemical, produced in excess of 6.4 billion pounds a year, generates \$6 million a day for businesses in the United States, Europe, and Japan.

"Like phthalates, the chemical bonds that create the polycarbonate polymer are not stable. They degrade in water and heat, when exposed to alcohol, soaps, or acids, and simply with age. As they break up, bisphenol-A leaches out" (pp. 70-71).

"Phthalates, bisphenol-A, dioxins, flame retardants, and some pesticides, as well as long-banned chemicals persisting in the environment, such as DDT, are major hormone disruptors" (p. 97).

"Among the many chemicals that can affect gene expression to trigger cancer are the herbicide atrazine, the plastic ingredient bisphenol-A, and dioxin (a by-product of chlorine), the most potent family of carcinogens the EPA has ever studied (p. 101).

"The chemical bisphenol-A even at very low doses also turns rats hyperactive and aggressive" (p.123).

"In organizing a review of studies to bisphenol-A and eighteen other chemicals, the understaffed (two-person) center within [NIEHS] charged with the essential task of evaluating chemicals for their possible harm to human fertility or fetal development similarly turned to a for-profit company for assistance. In this case, the center entered into an eight-year, \$5 million contract with Sciences International to assist in this review. When it became public that Sciences International's other clients included Dow Chemicals and BASF, both of which manufacture bisphenol-A, the company was fired. The ensuing report, though it did express some concern for pregnant women and fetuses, otherwise found either negligible or minimal concern; leading bisphenol-A researchers took strong exception to that conclusion, pointing out that Sciences International had excluded from its review a vast array of studies that found harm" (p. 161).

"In another study of industry influence on science, endocrinologist Fredrick vom Saal, the nation's foremost expert on the plastic ingredient bisphenol-A, reviewed the 115 published studies of the effects of low levels of the molecule on lab animals. He found that 90 percent of the 104 independent research studies concluded that bisphenol-A altered brain chemistry or had some other harmful effect; in contrast, all 11 studies paid for by plastics or chemical companies absolved the chemical of any harm. Similarly, when the American Plastics Council gave \$600,000 to the Harvard Center for Risk Analysis to review 19 studies of bisphenol-A, the center reported that none of them had found any unusual risk, though three of the reviewers refused to sign the report" (p. 179).

"Researchers can select the lab animal sure to prove their point. A study of bisphenol-A commissioned by the American Chemistry Council, for example, selected a type of rat that had been bred over hundreds of generations to be

extraordinarily insensitive to estrogen hormones, exactly the hormone disruption that bisphenol A seems to cause" (p. 180).

Pesticides

"Among those toxics with the highest number of [associations with cancer] will be "pesticides..." (pp. 59-60).

"Then cross-reference "pesticides" with the other illnesses that exposure can trigger. Asthma is one....Pesticides are also blamed for the sharp rise in premature births in the United States and other nations....Birth defects are another casualty of pesticides...Miscarriages are yet another casualty" (pp. 60-61).

"For instance, mice reacted with increased aggressive behavior and reduced body weight when fed a diet of combined agricultural pesticides, even at low levels..." (p. 123).

DEET

"[W]hile DEET, the active ingredient in many common mosquito repellants and various other pesticides, showed up in children's bodies in higher concentrations than in adults', sometimes twice as high" (p. 46).

Solvents

"If you look at the entries for birth defects, you will see that they are linked not only to pesticides, but also to solvents. Mothers exposed to solvents, according to research such as the multiyear Baltimore-Washington Infant Study, and the wives of men exposed to solvents bore a higher than average number of children with birth defects. Solvents also increase the risk of spontaneous abortion, as do hormone-disrupting chemicals from phthalates to bisphenol-A, from dioxin to PCBs" (p. 61).

Discussion Regarding American Chemistry Council

"Any new chemical that comes on the market today is going through a battery of screens and tests for health and developmental effects" (Chris VandenHeuvel) (pp. 53-54).

"We did, however, try to talk to executives of the American Chemistry Council (formerly the Chemical Manufacturers Association), the industry's chief trade association, to ask for their views about chemicals in the environment and their effect on children's health. We hoped to offer the industry group an opportunity to present its version of the information we were uncovering in our research and to obtain industry views on the issues taken up in this book. Despite our effort, we were unable to do so....[ACC] did send us in advance of our aborted meeting with them a document that proved to be quite instructive about the industry's attitudes toward some of the issues discussed in this book. It was the council's comments on a draft report about toxic chemicals and children's health prepared by the North American Commission on Environmental Cooperation....The council's comments

were, in essence, an attempt to deny that toxic chemicals are a threat to children's health or to minimize their danger" (pp. 148-149).

ACC is said to have spent \$27 million on lobbying between 1998 and 2004, and "[s]ometimes it itself has written the laws and rules that are then adopted by politicians to whom the industry has given campaign contributions and wined, dined, and entertained" (p. 148).

ACC "conducts public relations campaigns and helps set up "citizens' groups," which purport to represent consumers on the issues it seeks to influence. It also arranges for scientific research that supports the industry and seeks to place allies in government posts and advisory boards" (p. 148).

"In 2001, [ACC] entered into an agreement with [NIEHS] to fund research "for understanding the possible effects of environmental factors and chemicals on human reproduction and fetal and childhood development" and a similar agreement with EPA. The [GAO] found fault with with partnerships' lack of public oversight" (p. 148).

"One of [ACC's] more intensive lobbying campaigns was to reduce the reporting requirements under the government's Toxics Release Inventory" (p. 148).

"[ACC] even has input into United States diplomacy. According to a report released by a House committee in 2004, the chemical industry has worked with the Bush administration "to undermine a European plan that would require all manufacturers to test industrial chemicals before they were sold in Europe" (p. 148).

The Responsible Care program, while identified as "[one of the seemingly positive initiatives" by ACC, is dismissed (in the Environmental Working Group's words) as "chiefly a response to growing public distrust of the chemical industry after the chemical disaster in Bhopal...primarily a public relations effort to polish the image of a notorious industry that has consistently fought against meaningful health and safety precautions for workers or communities" (p. 150).

Records obtained by the authors from Public Employees for Environmental Responsibility noted that ACC "had become the EPA's leading research partner" during the Bush Administration (p. 159). "One of the joint projects with [ACC] was a study that would have given parents \$970 and a camcorder in return for continuing to spray pesticides in rooms used by their babies and infants, to observe their health effects. The study was cancelled following expressions of public outrage at the prospect of using kids as test animals" (p. 159).

ACC spent "[f]abulous sums" - \$185 million - between 1952 to 1996 on ads directed at consumers, "which the authors claim was "with great effect" (p. 190).

ACC occupies "luxurious quarters" like "most other industry trade and lobbying organizations" (p. 209).

Discussion of Other Consultants and Researchers

Chapter Nine, *Witnesses for the Defense*, discusses the Weinberg Group (p. 172-173, 177); Jim Tozzi and the Data Quality Act (p. 174- 177); Exponent and Dr. Dennis Paustenbach (pp. 182-184); Exponent and Dr. Betty Anderson (p. 189-190); the Harvard Center for Risk Analysis (p. 184-185); and the University of Alabama and Dr. Elizabeth Delzell (p. 185-187).

DRAFT July 21, 2008

Strategic Communications Plan for the Release of *Poisoned Profits*

GOAL

Mitigate impact of the book in the media and amongst policymakers.

STRATEGIES

- Position the book as a rehash of inaccurate and already disproven claims, written by biased authors who have made a career of attacking chemicals.
- Emphasize the benefits of chemistry in making kids healthier and more secure.
- Emphasize how the industry has taken responsibility for its actions through a multitude of programs.

TACTICS

Getting ready – between now and publication (Aug 12th)

- Identify and recruit third parties to deliver key messages
 - Candidates to include scientists, academics, pediatricians, former regulators, think tanks (business, legal reform, economics, scientific).
 - Third parties will be utilized to develop and submit book reviews and opinion pieces, post items on Website and blogs (their own or others, like Amazon.com) and be available for media interviews.
 - Provide media training to third parties (if deemed necessary).
- Obtain advance copy of book and provide to third party and internal experts for review/critique.

Lead: ACC/PN pursuing on multiple fronts; working to obtain asap
Projected date for completion? ASAP

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- Develop key messages, fact sheets (including piece on setting record straight on assumptions in book), Q and A, suggested "tough questions," ACC press release; provide to ACC members.
- Gather as much information as possible about book tour and media plans.
- Consider setting up Website, blog or "microsite" within americanchemistry.com to post documents and comments; continually update.

Who, what & when

- Communicate/coordinate with affected ACC members.

Who, what & when

- Consider contacting groups representing other industries mentioned in book to discuss strategy and share intelligence.

Additional Considerations

Contingency Planning if Book Generates Major Media Interest

- Identify and train key third party spokesperson, preferably a female pediatrician.
- Ensure inclusion of spokesperson in any story or broadcast program that covers book and its authors

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Post (or just prior to) publication

- Work with third parties to send book reviews to major mainstream and scientific media outlets (*The Washington Post*, *The New York Times*, *Nature*, *Science*) and trade publications (i.e., *Chemical and Engineering News*, *Chemical Week*).
- Identify opportunities to place third parties in stories/broadcast coverage.
- Prime “friendly” groups and columnists with a digital presence by providing materials and encourage them to comment on their Websites and blogs.
- Prepare and send email to leading healthcare, environmental and scientific reporters (i.e., *New York Times* reporter Gina Kolata) to “inoculate” them against the book allegations; will include fact sheets, our own Q&A, suggested “tough questions” for the authors and other materials; may also suggest third parties as sources.
- Encourage sympathetic syndicated columnists, editorial writers and reporters to criticize book as “fear mongering” and inaccurate.
- Set up rapid response to positive and negative reviews – have third parties immediately send in letters/post responses.
- If book tour schedule becomes known, prepare media lists covering target locations and send materials to media one week prior to each scheduled stop.
- Monitor Web/blogs for mentions of the book, draft posts/comments and work with third parties to submit responses as appropriate.

NOTE: *We will have to continually monitor and calibrate our outreach based on whether the book is getting any traction in the media. We don't want to stimulate coverage.*

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