

From Bureaucrats to Fat Cats

**EPA Pesticide Program is
a "Farm Team" for the
Pesticide Lobby**



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From Bureaucrats to Fat Cats: EPA Pesticide Program is a “Farm Team” for the Pesticide Lobby

“Few restrictions should be forthcoming from the EPA in the next couple of seasons, in part because Vice President Al Gore wants to be president.”

—Dan Barolo, Director, Office of Pesticide Programs (1994-1997), current VP at Jellinek, Schwartz & Connolly. *The Packer*, March 8, 1999

Most Washington insiders are familiar with the concept of the revolving door— former government officials leave their respective agencies to work as lawyers, lobbyists and consultants, offering easy access to the government process and insider know-how to clients. The problem is so pervasive that one of President Clinton’s first presidential acts was to establish rules dictating how long former government officials must wait before they are allowed to lobby former co-workers. Many states have similar laws and guidelines on the books.

But long before this federal “revolving door” rule was in effect, a striking number of the Environmental Protection Agency’s (EPA) top pesticide officials had already gone on to assist toxic pesticide manufactur-

ers in circumventing and delaying EPA’s efforts to protect public health.

The Environmental Working Group examined the current employment of former top pesticide regulators at the U.S. EPA. Our analysis, which was limited to individuals no longer working at the agency, found that two-thirds of the highest ranking officials since the pesticide program was established now receive at least part of their paycheck from pesticide interests actively fighting EPA efforts to protect infants and children from pesticides.¹ This includes four out of six former Assistant Administrators for Pesticides and Toxic Substances since 1977, and two out of four former directors of the Office of Pesticide Programs since 1983.

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In fact, five of these twelve individuals work for Jellinek, Schwarz & Connolly (JSC), a consulting firm headed by Steven Jellinek, former Assistant Administrator for Pesticides and Toxic Substances during the Carter Administration. Jellinek is joined at the firm by:

- Former Director of the Office of Pesticide Programs, Dan Barolo
- Former Special Assistant to the Assistant Administrator, James Lamb
- Former EPA general counsel for pesticides, Ed Gray
- Former Deputy Director of Toxics, Edwin "Rick" Tinsworth

- James A. Wells, the former head of the California Department of Pesticide Regulation

Jellinek, Schwartz and Connolly's known clients have included the pesticide giants Monsanto, Dow, The Chemical Manufacturers Association, Cheminova and FMC Corp, as well as the National Cotton Council, Society of the Plastics Industry, Halogenated Solvents Industry Alliance, and The National Association of Wheat Growers (*Toxic Deception* p. 117, EPA documents, *Plastics News*, October 19, 1998, *Food Chemical News*, February 17, 1997). See final section below for more information on Jellinek, Schwartz and Connolly's role in undermining the Food Quality Protection Act.

Other high level officials who now represent the pesticide industry include former Assistant Administrators Linda Fisher, current chief of Monsanto's Washington, DC office, John Todhunter, an expert for hire whose clients have included The Tobacco Institute and the toxic pesticide maker ABERCO, and Marcia Van Gemert, an Office of Pesticide Programs official who was the EPA liaison to the 1993 National Academy of Sciences study on pesticide in the diets of infants and children, who now represents pesticide industry clients fighting implementation of that committee's recommendations.

Former Assistant Administrators

66% “gone to industry” between 1977 and 1998. There have been a total of six Assistant Administrators and one acting Assistant Administrator from 1977 (when the Office of Pesticides and Toxic Substances was established) and 1998 when Lynn Goldman resigned her position. Four are closely associated with the pesticide industry. (The “Acting Administrator” was not included in the analysis.)

Steven D. Jellinek

Bureaucrat: Former Assistant Administrator of Pesticides and Toxic Substances (10/13/77 - 1/20/81). Jellinek was the first Assistant Administrator in the history of the program. Before working at the EPA, Jellinek served as the Staff Director at the White House Council on Environmental Quality (*Washington Representatives*, 1999).

Fat Cat: Chairman, **Jellinek, Schwartz & Connolly Inc. (JSC)**. See below for more information on Jellinek, Schwartz & Connolly. JSC’s known clients include **Monsanto, Dow, The Chemical Manufacturers Association, Cheminova and FMC Corp**, as well as the **National Cotton Council, Society of the Plastics Industry, Halogenated Solvents Industry Alliance**, and **The National Association of Wheat Growers** (*Toxic Deception* p. 117, EPA documents, *Plastics News*, Octo-

ber 19, 1998, *Food Chemical News*, February 17, 1997).

John Todhunter

Bureaucrat: Former Assistant Administrator for Pesticides and Toxic Substances (11/13/81-1/20/81). Caught up in the Anne Gorsuch scandal, Todhunter was forced to resign after less than a year and a half when his industry ties were publicly exposed.

While Assistant Administrator Todhunter was dubiously credited with holding up the review of formaldehyde, which has since been classified as a probable human carcinogen. Todhunter reportedly “lashed out” at his EPA staff in an August 1, 1991 meeting for recommending tighter controls on ethylene dibromide (EDB), a fumigant pesticide (*UPI*, July 7, 1985). EDB has since been banned.

Documents obtained in a 1984 lawsuit against the EPA revealed Todhunter held secret meetings with pesticide companies, after which he ended regulatory actions against six chemicals known as EBDC, despite the fact that at the time, scientists predicted “an unusually high cancer risk of up to one in 2,000” from the chemicals found on many common foods (*UPI*, September 21, 1984).

Fat Cat: Todhunter now works for Science Regulatory Services, a Washington, DC consulting firm. Todhunter’s clients have included **ABERCO**, a

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Director, Office of Pesticide Programs: Five people have held this position since 1983. One is still with the EPA, two represent pesticide industry interests.

pesticide manufacturer, and the **Tobacco Institute**.

In 1992 Todhunter criticized an EPA report linking secondhand smoke and health effects “on behalf of the Tobacco Institute.” (*American Association for the Advancement of Science*, July 31, 1992) More recently, Todhunter was exposed in a Saint Paul *Pioneer Press* story as an expert for hire. According to the article, tobacco companies budgeted \$25,000 for an article to be written by Todhunter and tobacco consultant W. Gary Flamm, on “EPA process, risk assessment-risk management issues” for the *Journal of Regulatory Toxicology and Pharmacology*.

John A. “Jack” Moore

Bureaucrat: Assistant Administrator for Pesticides (11/21/83-8/14/88).

While he was Assistant Administrator for Pesticides and Toxic Substances, Moore reportedly had dinner on several occasions at the home of Steve Jellinek, an industry consultant, at the same time a pesticide Jellinek represented was under review at the EPA. Jellinek was a hired consultant of **FMC Corp.**, the manufacturer of carbofuran, a highly toxic insecticide under review by the EPA. Moore is credited with delaying action on carbofuran, despite the recommendations of his staff to the contrary. Moore denied that his relationship with Jellinek colored his judgement, and said he did not realize Jellinek was

working for FMC (*The Washington Post*, September 12, 1988).

Fat Cat: Moore is president of a think tank, “The Institute for Evaluating Health Risks.” The Institute, a non-profit organization, has recently come under fire for writing a **General Electric**-funded study denying a link between worker-related human cancer deaths and PCB exposure. GE is currently facing a multi-million dollar PCB clean-up project in the Hudson River. PCBs are classified as a probable human carcinogen by the EPA, and have many non-cancer death health impacts, including neurological, motor, reproductive and immune problems, especially in children. The Institute’s study only looked at worker exposure, where most only had “limited exposure to the most toxic or carcinogenic PCBs” according to an EPA representative. Many other studies have shown a link between cancer and PCBs (*Inter Press Service*, April 13, 1999).

The Institute has received funding from **GE**, the right-leaning **Olin Corporation Charitable Trust**, **Texaco**, and **Mobil**.

In 1994, Moore served as co-chair on a panel convened by the **Chemical Manufacturers Association** to evaluate the health risks of dioxin, in response to the EPA’s release of a report identifying dioxin as a probable human carcinogen.

The Chemical Manufacturers Association paid an estimated \$200,000 to finance the panel (*National Journal*, December 3, 1994). Most major pesticide companies and chemical manufacturers are members of the Chemical Manufacturers Association.

Linda J. Fisher

Bureaucrat: Assistant Administrator Pesticides and Toxic Substances (8/15/89- 1/20/93), Assistant Administrator Policy and Evaluation (1988-89), Chief Staff to Administrator (1985-87), Special Assistant to Assistant Administrator Solid Waste and Emergency Response (1983-1984) (*Marquis Who's Who*).

Fat Cat: Vice President for worldwide and government/public affairs, at the Monsanto Corporation, a company with a dubious environmental record.

In 1994, a year before Fisher arrived on the job at Monsanto but after she left the EPA, the agency finally registered the Monsanto weed killer acetochlor. The registration had been rejected by the EPA, even under Fisher's watch.

At the time acetochlor was put on the market, EPA acknowledged that it would probably contaminate drinking water supplies throughout major corn growing regions, though Monsanto assured EPA that use restrictions would prevent ground water contamination (*Chemical Week*, February 5,

1997). Unfortunately, Monsanto was mistaken. Tests by the manufacturer found acetochlor in 20 percent of all tap water samples, and in 40 percent of all water systems tested (Amy Hackett, Acetochlor Registration Partnership Submission, June 9, 1997. Wilmington DE).

Monsanto most recently gained wide notoriety for developing a genetically engineered corn plant that not only kills pests, but was also lethal to beneficial and endangered insect species such as the Monarch butterfly (*New York Times*, May 20, 1999).

Director, Office of Pesticide Programs

50% "gone to industry" since 1983. Five people have held this position since 1983. One is still with the EPA, two represent pesticide industry interests.

Steve Schatzow

Bureaucrat: Director, Office of Pesticide Programs (1984-86), and various sections of the EPA between 1976 and 1984.

Fat Cat: Partner at the Government Relations section of Morgan, Lewis & Bockius of Washington, DC. Schatzow's "representative clients" include "agricultural chemicals, pulp and paper, and specialty chemicals." (ML&B bio page, from their website) Schatzow is partially responsible for: expediting pesticide registrations, "defense

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Daniel Barolo,
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against EPA enforcement actions alleging mislabeling or sale of unregistered products,” representing pesticide companies “at hearings before EPA precipitated by the issuance of Notices of Intent to Suspend” and representing pesticide manufacturers “before EPA on special reviews.”

Morgan Lewis & Bockius plays up Schatzow’s former EPA position as an inside advantage to perspective clients. Their information on their “environmental” practice brags, “All aspects of legal work involving pesticides require extensive knowledge of the complex procedures that the EPA Office of Pesticide Programs uses to evaluate products. Steven Schatzow, former Director of EPA’s Office of Pesticide Programs, is especially well-qualified to address all aspects of the pesticide registration process, from initial submissions to reviews of existing chemicals. He has developed an active practice representing several dozen companies before EPA on a wide range of pesticide regulatory questions.” (<http://envinfo.com/desk95/deskscsc.html>)

Daniel Barolo

Bureaucrat: Director of the Office of Pesticide Programs (1994-97), oversaw implementation of the Food Quality Protection Act. Barolo also served as director of the Office of Pesticide Program’s Special Review and Registration Division. Served in management roles with the New

York State Department of Environmental Conservation. (*Engineering News-Record*, February 16, 1998 and JSC bio)

Fat Cat: Vice President, **Jellinek Schwartz & Connolly Inc.** Barolo claims that if the US takes actions on high-risk organophosphate insecticides, the rest of the world will have an unfair trade advantage (*Food Chemical News*, May 10, 1999). Barolo’s firm, Jellinek, Schwartz and Connolly, represents at least one major manufacturer of multiple organophosphates, **Cheminova**. In March of 1999, Barolo let one of his insider views slip. He told *The Packer*, a food industry trade journal, “Few restrictions should be forthcoming from the EPA in the next couple of seasons, in part because Vice President Al Gore wants to be president.” (March 8, 1999)

Additional Top EPA Pesticide Officials now collecting paychecks from pesticide manufacturers and other polluting industries

Dr. James C. Lamb

Bureaucrat: Former Special Assistant to the Assistant Administrator for Pesticides and Toxic Substances (1985-89). Lamb also worked as biologist and head of the Fertility and Reproduction Group, National Toxicology Program, National Institute of Environmental Health Services, Department of Health and Human Services (*Washington*

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Representatives, 1999 and JSC biography).

Fat Cat: Vice President of Scientific and Technical Services, **Jellinek, Schwartz & Connolly Inc.** (JSC). He “advises clients on scientific issues and regulatory science policies.” (JSC biography)

Lamb left the EPA when the agency’s decision to regulate the pesticide carbofuran was pending, to join Jellinek, Schwartz & Connolly, the primary consultant hired by **FMC Corporation** to defend its product, carbofuran (*The Washington Post*, September 12, 1988). According to *The Washington Post* in September 1988, Lamb “began job negotiations [with JSC] in November 1987, four months after he advised [Assistant Administrator Jack] Moore to reject the staff recommendation to ban the pesticide. Moore ordered the first of several revisions that have stalled the proposal to this day.”

Lamb currently serves on the National Academy of Sciences/ National Research Council committee on endocrine disrupting compounds (Hormone Related Toxicants in the Environment) while concurrently serving as a consultant for **The Society of the Plastics Industry**, which has a large financial stake in the committee’s findings (JSC biography, *Plastics News*, October 19, 1998). Lamb has spent his time on the committee calling for more studies and doubting the

findings of research contrary to a position more favorable to industry.

Ed Gray

Bureaucrat: Served at the Office of the General Counsel at the EPA for almost 20 years, and was the head of the pesticide branch for 13 years.

Fat Cat: Jellinek, Schwarz and Connolly’s Vice President, advises agricultural and food production/processing industries on “legislative and regulatory matters involving pesticides, food safety and related topics.” (JSC biography)

Susan Vogt

Bureaucrat: Vogt served as the Deputy Assistant Administrator under Linda Fisher.

Fat Cat: Director of environmental policy at **Georgia Pacific**, a timber company.

Don R. Clay

Bureaucrat: Deputy Assistant Administrator in the early 1980s, continued at the EPA in another department.

Fat Cat: Clay eventually ended up with his own consulting firm, Don Clay Associates. Don Clay Associates clients have included **Dow Chemical** and the **Chemical Manufacturers Association** (client list from *Toxic Deception* p. 117).

Edwin F. “Rick” Tinsworth

Bureaucrat: Former Deputy Director of Office of Toxic Sub-

stances and former Director of the Special Review and Registration Division in the Office of Pesticide Programs.

While serving as Special Review Director in 1990, Tinsworth proclaimed “We haven’t yet made the finding that carbofuran presents an unreasonable risk during the Special Review.” According to a National Audubon report, Tinsworth was working at Jellinek, Schwartz and Connolly just several weeks after issuing the statement. At the time, JSC was a consultant to **FMC Corporation**, the primary manufacturer of carbofuran, a pesticide attributed to significant bird deaths (*Audubon*, January 11, 1997).

Fat Cat: Vice President at **Jellinek Schwartz and Connolly (JSC)**. Tinsworth co-manages JSC’s pesticide practice and “provides policy and strategic advice to clients on a range of pesticide regulatory issues.” (JSC biography)

Marcia Van Gemert

Bureaucrat: Former Chief of the toxicology branch at the Office of Pesticide Programs. While at the EPA, Van Gemert served as a liaison to the 1993 National Academy of Sciences study on pesticides in the diets of infants and children.

Fat Cat: Van Gemert and her consulting firm now represent pesticide industry clients fighting implementation of that very committee’s recommendations. When she left the EPA, Van

Gemert started her own consulting firm in 1995, Charles, Conn & Van Gemert. In 1997, Van Gemert chaired a scientific panel convened by **DowElanco**, a Dow subsidiary, to evaluate the safety of Dursban, a pesticide. The panel declared Dursban safe. (DowElanco Press Release, Indianapolis, October 21, 1997). Charles, Conn & Van Gemert hired a 25-year veteran of the Office of Pesticide Program’s Environmental Fate and Groundwater Contamination, **Henry Jacoby**, in early 1997 as their new director of environmental affairs.

James “Jim” Wells

Bureaucrat: First Director of the California Department of Pesticide Regulation of the California EPA, a department started under Gov. Pete Wilson. Wells was known as a staunch defender of pesticides during his tenure at the California Department of Pesticide Regulation.

Fat Cat: Wells now heads the recently opened Sacramento, CA office for **Jellinek Schwartz and Connolly**. Wells “provides problem-solving strategies to address [pesticide] product registration and defense.” (JSC biography) The CA office of JSC is dedicated to obtaining “timely approval” to companies that make “agricultural, industrial, and consumer chemicals.”

Elin Miller

Bureaucrat: Miller worked for a number of years at the California EPA as the Chief

Deputy Director of the Department of Pesticide Regulation under Jim Wells, and served as director of the Department of Conservation, which she left in 1996 after only a year.

Fat Cat: Previous to her stint at the California EPA, she was the executive director of the **Western Agricultural Chemicals Association**, making her one of the few to move from industry into government and back again. Miller is now an executive with **Dow AgroSciences**. Miller also serves on the board of the Council for Agricultural Science and Technology, an industry front group for pesticide and food companies, as a representative of Dow.

**Christine Chaisson
Bureaucrat to Fat Cat:**

Chaisson left the Office of Pesticide Programs to start her own consulting firm on pesticide exposure, essentially duplicating what was then cutting edge software for calculating dietary exposure that she had developed as an EPA employee. The firm, called Technical Assessment Systems (TAS) (the same name as the prototype program developed at EPA), also employed a former EPA consultant, **Barbara Peterson**, and seven other EPA scientists and technicians familiar with the prototype program, essentially leaving the agency without the staff to further develop the program (*Legal Times*, January 3, 1994). As a result, the public's access to

the program, paid for with tax dollars, was significantly delayed.

TAS clients included **Dow Chemical, E.I. DuPont, and Rhone Poulenc**. TAS clients have used the program "to help beat back EPA regulations that would have curtailed EBDCs...to help persuade the California State Science Advisory Panel not to require warning labels on several products, to comment on a June 1993 National Academy of Sciences study that reported growing health hazards to children from pesticides, and to defend the **Uniroyal Chemical Co.**" during the consumer revolt over its pesticide, Alar, as the chemical was about to be banned (*Legal Times*, January 3, 1994). Alar is no longer on the market and is considered a probable human carcinogen by the EPA.

Peterson has since started her own consulting firm, Novagen Life Sciences, with a similar emphasis on calculating dietary exposure to pesticides for chemical manufacturers.

TAS was bought out by a wholly owned subsidiary of Pharmaceutical Product Development Inc., in January of 1997 (*PR Newswire*, January 15, 1997). The EPA never took action against Chaisson for duplicating their database program, and Chaisson claims to have recreated the program on her own, despite the identical name and function.

Chaisson now runs Chaisson Science and Strategies Consulting,

USA. Chaisson's firm still represents clients whose pesticides are in danger of being banned or restricted, and she has fought against enforcing the Food Quality Protection Act using the data generated by her private database.

Mark Greenwood

Bureaucrat: Greenwood is a former Associate General Counsel for Pesticides and Toxic Substances (1988-90) and former director of the Office of Pollution Prevention and Toxics (1990-94).

Fat Cat: Partner at the law practice of Ropes & Gray, a Washington DC-based firm. Greenwood's clients include the **Coalition for Effective Environmental Information**, formed by "various industry firms and groups to monitor and provide input on EPA's public information efforts and representatives of various associations, such as those in mining, petroleum and chemical industries." (*Chemical Week*, June 3, 1998). **Dow, Monsanto, Eastman Chemical** and **BASF Chemical** are among the 19 major manufacturers and several trade groups working to narrow the information required for public disclosure under "right to know" laws. They are specifically targeting the Toxic Release Inventory and a possible expansion of chemical use reporting requirements, opposed by industry (*Chemical Week*, April 2, 1997 and August 6, 1997).

Greenwood also represents the **Chemical Manufacturers**

Association and Union Carbide (*Chemical Week*, August 20, 1997 and *Washington Representatives* 1999).

A Little More About Jellinek, Schwartz & Connolly

Recently, Jellinek, Schwartz & Connolly (JSC), with its cadre of former EPA pesticide officials, has been instrumental in encouraging the pesticide industry to engage in the ethically suspect and scientifically dubious practice of testing pesticides on humans. What is so striking about the JSC plan is that it was overtly conceived as a strategy to avoid tougher regulations to protect children as required by the 1996 amendments to the nation's pesticide law, known as the Food Quality Protection Act. A June 1998 JSC report to the industry-funded Implementation Working Group, "a coalition of farm, food, manufacturing and pest management organizations," explicitly outlined this plan in "A Science Based, Workable Framework for Implementing the Food Quality Protection Act." The report advised,

The [pesticide] registrants will find it increasingly undesirable to rely on end points derived from animal data, since this customarily requires the application of a 10-fold uncertainty factor (UF) to account for interspecies variation in addition to the other UFs used. For this reason, there will probably be an increased reliance by registrants on data from human

studies on acute or short-term toxicity of OPs [organophosphate insecticides] that could avoid the need for that 10-fold UF for interspecies extrapolation... (p. II-8)

Cheminova, a Danish company, was one of the pesticide manufacturers identified in a September 28, 1998 *Wall Street Journal* article as resuming human testing on its product malathion, an organophosphate. Chris Wilkinson of JSC was quoted in the same article as having knowledge of “at least seven human tests with pesticides” underway or in the works. Wilkinson added, “The time has come when the industry has to come up with real data— real toxicology data and real exposure data— that relate to humans.”

JSC has represented Cheminova in the US, trying to prevent the ban of methyl parathion, a chemical responsible for highly publicized deaths and poisonings when misused by exterminators. Critics point to Jellinek, Schwartz & Connolly as the reason EPA didn't ban (and still hasn't banned as this report goes to press) methyl parathion, which also poses health risks from legal usage. When questioned about his intimate knowledge of the EPA in reference to methyl parathion, Steve Jellinek told a reporter, “You are absolutely right, I know the system well. And that's why clients come to me.” (*CNN Impact*, December 7, 1997)

Cheminova manufactures high-risk organophosphates in addition to methyl parathion and malathion. Parathion, chlorpyrifos, dimethoate, and ethion are all Cheminova products that could soon be restricted or banned by the EPA. The EPA considers both adults and kids at risk from exposure to organophosphate insecticides due to food residues from legal usage (<http://www.epa.gov/pesticides>).

Shortly after the Environmental Working Group published an exposé on human testing in the summer of 1998 (*The English Patients*), the EPA issued a strong statement against the practice. The brief EPA statement dated July 27, 1998 read, “The EPA is deeply concerned that some pesticide manufacturers seem to be engaging in health-effects studies on human subjects as a way to avoid more protective results from animal tests under the new Food Quality Protection Act.”

In addition to recommending human testing to avoid more protective pesticide exposure standards required by the Food Quality Protection Act, JSC offers a host of complementing services. For example, JSC can stop EPA from suspending a product without review. Their web site boasts that “when an agrochemical manufacturer heard EPA was planning to suspend the use of an important product, they asked JSC to manage the defense of the product... JSC challenged EPA so persuasively that EPA agreed to settle this dispute... enabl[ing] the client to

save 75% of the products annual sales and avoid the expense of a formal hearing.” (“Case Studies—Product Defense and Approval,” from jsc.com) If that weren’t enough help, JSC can also grease the wheels of the product approval process. In one case, “JSC’s involvement helped move... two chemicals from a position where they were completely blocked to one in which they can manufactured without constraint.” (also from web site).

Jellinek, Schwartz and Connolly’s known clients have included the pesticide giants **Monsanto, Dow, The Chemical Manufacturers Association, Cheminova** and **FMC Corp**, as well as the **National Cotton Council, Society of the Plastics Industry, Halogenated Solvents Industry Alliance**, and **The National Association of Wheat Growers** (*Toxic Deception* p. 117, EPA documents,

Plastics News, October 19, 1998, *Food Chemical News*, February 17, 1997). JSC is an associate member of the **American Crop Protection Association**, which represents major pesticide manufacturers.

So how profitable is this business? Jellinek Schwartz and Connolly was bought by International Technology Corp of Pittsburgh in January 1998. At that time, JSC had a reported revenue of \$10 million a year (*Pittsburgh Business Times*, January 21, 1998). JSC has also been profitable enough to expand its reach with the recent addition of a Sacramento, CA office. The Sacramento office is run by the former head of the CA Department of Pesticide Regulation, Jim Wells. JSC also has a London-based European subsidiary, JSC International LTD and an office in Texas called Sieken, Inc.

Note

¹ These numbers are slightly higher than the average findings of an earlier study by the Center for Public Integrity, a public interest group. The Center for Public Integrity found that of the 40 officials who left top level positions in the pesticide and toxics divisions of the EPA over a 15 year period, 18 individuals went to work for chemical manufacturers, trade organizations or pro-chemical lobbying firms. Only two individuals went to environmental organizations. (Dan Fagin and Marianne Lavelle, *Toxic Deception: How the Chemical Industry Manipulates Science, Bends the Law, and Endangers Your Health*. Birch Lane Press, 1996. p. 116).

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