



702 H Street, NW, Suite 300, Washington, DC 20001

Tel: 202-462-1177 • Fax: 202-462-4507

1-800-326-0959 • [www.greenpeaceusa.org](http://www.greenpeaceusa.org)

## **The American Chemistry Council and U.S. Chamber of Commerce Led 2008 Campaign to Kill Chemical Security Legislation**

**By Rick Hind, Legislative Director, Greenpeace Toxics Campaign  
Mae Stevens, Policy Analyst, Greenpeace Toxics Campaign  
Laila Williams, Intern, Greenpeace Toxics Campaign**

**August 2009**

**"We cannot allow chemical industry lobbyists to dictate the terms of this debate.  
We cannot allow our security to be hijacked by corporate interests."**

-Barack Obama (March 30, 2006)

## **I. INTRODUCTION**

Since the attacks of September 11<sup>th</sup>, chemical facilities have remained one of our nation's most vulnerable sectors to terrorism. The Department of Homeland Security (DHS) has identified 6,300 chemical facilities as "high-risk".<sup>1</sup> The U.S. Army Surgeon General estimated that an attack on just one U.S. chemical plant could kill or injure 900,000 to 2.4 million people.<sup>2</sup> Despite numerous warnings since 2001, little has been done to address these hazards beyond conventional fence-line security.

Since the introduction of the first comprehensive chemical security bill in 1999, the chemical industry, led by trade associations such as the American Chemistry Council (ACC), has launched an all-out assault against any similar regulations, running aggressive lobbying campaigns against chemical facility security legislation. In 2006 they succeeded in derailing comprehensive chemical security legislation (H.R. 5695 & S.2145) and worked closely with Republican leaders to draft the 2006 interim law, a rider on the FY 2007 DHS appropriations bill.

The interim law, which expires on October 4, 2009, prohibits DHS from requiring the use of any specific security measure including safer chemical processes or technologies, exempts approximately 2,600 water treatment facilities and hundreds of port facilities from regulations, and prohibits lawsuits to enforce the law. In 2008, the chemical industry lobby put their short-term interests ahead of public safety to derail chemical facility legislation that would have begun to safeguard communities against potential terrorist attacks.

This report identifies the key chemical industry trade associations that killed chemical security policy and legislation on Capitol Hill in 2008. There are intricate relationships between companies, trade associations, and the lobbying firms they hire to oppose comprehensive chemical security legislation. The revolving door of public servants becoming lobbyists for the industries they once regulated ensures that these special interests are better represented than the people who are endangered by their business practices. In compiling this report, Greenpeace has identified former members of Congress, legislative directors, chiefs of staff and other staff who advocated on behalf of the chemical industry and ultimately derailed comprehensive chemical security legislation in 2008.

It should be noted that this report was based on direct lobbying records reported through the Lobbying Disclosure Act of 1995 (LDA), and thus represents only a fraction

---

<sup>1</sup> 15 May 2009 "DHS Risk Tiers For Chemical Facilities" DHS Staff Briefing of Labor and Environmental Groups on Chemical Security

<sup>2</sup> <http://www.washingtonpost.com/ac2/wp-dyn/A10616-2002Mar11>

of the breadth and depth of the chemical industry's influence on chemical security policy in the U.S.

## II. MARCH 2009 INDUSTRY LETTER TO CONGRESS

In a letter to Congress dated March 2<sup>nd</sup>, 2009, 34 trade associations representing the chemical industry urged members of Congress to make permanent the flawed regulations currently in place (see [Appendix A](#)). They "strongly urge[d]" Congress to oppose any "provisions that would mandate government-favored substitutions" meaning industry requirements for safer and more secure chemicals and processes that would eliminate the possibility of deaths in the event of a catastrophic attack on a chemical plant. This report used the March 2<sup>nd</sup> letter as a road map to track the 2008 lobbying of the chemical industry trade associations.

In an attempt to distance themselves from the more dogmatic recommendations of the groups that signed the March 2<sup>nd</sup> letter, the ACC, the trade association representing the country's largest chemical manufacturers did not sign the March 2<sup>nd</sup> letter. However, leading member companies of the ACC, such as Dow and DuPont are closely affiliated with trade groups that did sign the March 2<sup>nd</sup> letter. DuPont belongs to four of the trade associations on the March 2<sup>nd</sup> letter; and Dow belongs to nine trade associations on the letter (see flow chart in [Appendix B](#)). Of these nine trade associations, seven reported high levels of lobbying activity that accounted for an estimated forty percent of total chemical security spending by all registered lobbying entities surveyed in this report. Dow also contributes half a million dollars a year to the ACC and over \$1 million to the U.S. Chamber of Commerce annually (see flow chart in [Appendix B](#)).<sup>3</sup>

In an E&ETV interview on March 21, 2007, ACC CEO Jack Gerard said that, ***"we [the ACC] believe the Department of Homeland Security should have the ability to put these regs in place. Let's let the dust settle, and then a few years down the road let's take a look at it."***<sup>4</sup> Since then, the ACC has lobbied heavily to prevent stronger more secure requirements from being enacted.

In March 2009, Greenpeace wrote the largest member companies of the ACC, Dow and DuPont urging the companies to implement safer chemical processes and support chemical security legislation requiring its use (See Appendices [C-1](#) and [C-2](#)). Greenpeace explained that the benefits to both companies would include billions of dollars in liability relief, fewer regulatory obligations and more sustainable long-term profits. Greenpeace noted that on December 17, 2008 Dow announced a new venture with K2 Pure Solutions in the San Francisco Bay Area that "will utilize Inherently Safer salt-to-bleach Technology (IST), an emerging, sustainable process..." (see [Appendix C-3](#)). When the plant is modified, Dow will no longer ship 90-ton rail cars of chlorine from their own Texas facility to their Pittsburgh, CA plant. DuPont has at least four plants that could eliminate these risks using similar technologies (see [Appendix C-2 MAP](#)).

Not only have Dow, DuPont, and the ACC continued to lobby against strong legislation, but Dow and DuPont are also members of the more publicly militant trade associations

<sup>3</sup> <http://www.dow.com/corpgov/political/trade.htm>

<sup>4</sup> [http://www.eenews.net/tv/video\\_guide/587](http://www.eenews.net/tv/video_guide/587)

that signed the March 2nd letter to Congress. Based on analysis of lobbying reports, the ACC was a leading partner in industry efforts in 2008 to successfully kill legislation that would have protected more than 110 million Americans still at risk. Based on Dow and DuPont's responses and publicly available statements, their efforts to delay, weaken, or derail this legislation continue to this day. The ACC, Dow and DuPont have all devoted significant portions of their lobbying teams to chemical facility security issues (see [Appendix E](#)). Forty-seven percent of Dow's lobbyists, forty-four percent of DuPont's lobbyists, and over eighty percent of ACC lobbyists (including hired lobby firms) registered to work on chemical facility security in 2008 (See [Appendix E](#)).<sup>5</sup>

In addition to examining ACC lobbying and other chemical industry trade organizations, this report looked at the ACC's two largest member companies, Dow and DuPont, for an example of what individual companies are doing. Together these three entities ranked among the largest spenders on chemical security (see [Appendix D](#)). Dow and Dupont's membership in the various trade associations that signed the March 2nd, 2009 letter, as well as their membership in the ACC, is evidence of the interconnections between these organizations. Out of the 34 trade organizations that signed the March 2009 letter, 22 reported lobbying activity. Additionally, Dow, DuPont and ACC reported significant lobbying on chemical security issues in 2008. At least four firms were hired by these three groups to lobby specifically on matters concerning chemical security legislation. Of the 31 entities surveyed in this report, a total of 353 lobbyists were registered; 169 of which lobbied specifically to weaken chemical security legislation. Many of the trade associations, corporations and hired lobby firms are not only related, but also appear to collaborate closely on delaying or derailing legislation (see [Appendix F](#)).

The industry effort to derail the chemical security legislation has been enormous. A total of 169 lobbyists were deployed on Capitol Hill on behalf of these trade associations, by the combined groups of the March 2<sup>nd</sup> 2009 letter, as well as the ACC and its two largest members. What the report confirms is that the trade groups' lobbying is the tip of the iceberg, backed by scores of lobbyists hired by each member company. While lobby disclosure forms provide few details on spending by issue, Greenpeace estimated a range of spending on lobbying from nearly \$13 million to nearly \$44 million in 2008 based on such reports (see [Appendix D](#)).

### III. THE REVOLVING DOOR

Among the 169 chemical security lobbyists identified in this report, many came from positions in government as members of Congress, legislative directors, and chiefs of staff. The industry also hired Democrats to better represent them to a Democratic Congress. Below is summary of some of these lobbyists and their past roles in government:

#### **CAL DOOLEY**

**Former congressman of California (D-CA)**, Dooley was appointed as the CEO of the ACC in September 2008. While Dooley was not registered

---

<sup>5</sup> These percentages include lobbyists hired from outside lobbying firms

as a lobbyist during 2008, he has registered to lobby on issues including chemical security during the first two quarters of FY 2009 under the ACC.

### **OTHER ACC LOBBYISTS**

In addition to its own lobbyists, the ACC hired three additional lobbying firms to strengthen their squadron - **Bob Moss & Associates**, **Ogilvy Government Relations** and **Holland & Knight LLC**. Bob Moss was hired to lobby on behalf of the ACC, allocating one hundred percent of its \$120k budget towards chemical plant security legislation (see [Appendix H](#)). Ogilvy Relations lobbyists, **Moses Mercado** and **Julie Dammann**, both come from government backgrounds. Prior to Ogilvy in 2005, Dammann was Chief of Staff to then **Senator Christopher Bond (R-MO)**, a firm opponent of inherently safer technologies (IST). **Mercado**, who was recently listed as one of the “top lobbyists: hired guns” on Capitol Hill, was an Obama “Super Delegate” from Texas and volunteered his time to the Obama presidential campaign and was listed by TheHill.com as having been hired to “[have] helped Ogilvy put its all-Republican past behind it”<sup>6</sup>. **Mercado’s** employment record includes positions as former aid to House Democratic Leader **Dick Gephardt (D-MO)** and Chief of Staff to **Representative Gene Green (D-TX)**. Both lobbyists represented the ACC and lobbied on issues specifically relating to chemical security legislation in 2008.

### **GERRY SIKORSKI**

**Former Representative Gerry Sikorski (D-MN)** represented the 6<sup>th</sup> congressional district in Minnesota for ten years (1983-1993) and served on the Energy and Commerce Committee. Sikorski is among two Holland & Knight lobbyists, hired to work on chemical security by the ACC. His prior experience writing the community-right-to-know section of the Superfund Act makes him an attractive advocate on behalf of the ACC. Also with Holland & Knight is lobbyist **Kathryn Lehman**, previously the Chief of Staff from 2003-2005 to former **Representative Tom DeLay (R-TX)** of Texas.

### **JOHN ENGLER**

**Former Governor of Michigan (R-MI)** from 1991-2003, John Engler was named the president and **CEO of NAM** in 2004.<sup>7</sup> The corporate headquarters of the **Dow Chemical Company**, also a member of the NAM, is located in Midland, Michigan.<sup>8</sup> Engler was also chairman of the National Governors Association (NGA) from 2001-2002.<sup>9</sup>

### **OTHER NAM LOBBYISTS**

Other NAM lobbyists who have made use of the revolving door are **Lean Paradise**, **Keith Smith**, and **Jay Timmons** who have all previously been

---

<sup>6</sup> <http://thehill.com/business--lobby/top-lobbyists-hired-guns-2009-05-14.html>

<sup>7</sup> <http://www.michigan.gov/formergovernors/0,1607,7-212-31303-2273--,00.html>

<sup>8</sup> <http://www.dow.com/facilities/namerica/michigan2.htm>

<sup>9</sup> <http://www.subnet.nga.org/centennial/timeline/2000.htm>

employed by then **Senator George Allen (R-VA)**.<sup>10</sup> **Brent Perry**, an ACC chemical lobbyist, also has previous experience working for then **Senator Allen**.

#### **NPRA and BRENDAN WILLIAMS**

**Brendan Williams**, who served as Legislative Director to **Representative Vito Fossella (R-NY)** from 2005-2007, now lobbies on behalf of the **National Petrochemical & Refiners Association (NPRA)**, which ranks amongst the largest spenders on chemical security lobbying surveyed in this report (see [Appendix D](#)).

#### **OTHER INDUSTRY GROUPS**

Industry lobby groups and allies in the 2008 lobbying campaign against safer chemical security regulations include the **Agricultural Retailers Association (ARA)**, whose board of directors includes leaders from **Dow**. The **Environmental Technology Council (ETC)** -- which is backed predominantly by the hazardous waste and incinerator industry, is another group. The ETC describes itself as a "trade association of commercial environmental firms that recycle, treat and dispose of industrial and hazardous wastes".<sup>11</sup>

### **IV. SUMMARY OF FINDINGS**

To better understand the 2008 chemical trade associations' direct lobbying campaign against comprehensive permanent legislation and regulations, Greenpeace surveyed the quarterly 2008 congressional lobbying records submitted by signers of the March 2nd 2009 letter, as well as chemical industry giants Dow, DuPont and the ACC. Using a conservative methodology (see page 11) Greenpeace established a range from nearly \$13 million to over \$44 million spent on lobby specifically on chemical plant security legislation and regulations. A total of 31 separate industry entities registered to lobby on chemical security legislation. These included: 23 trade associations such as the ACC, Edison Electric Institute, and the U.S. Chamber of Commerce; a sampling of two companies served by these trade associations – Dow Chemical Company and DuPont; and 6 lobby firms, including Ogilvy Government Relations, Bob Moss & Associates and Holland & Knight LLC.

Due to the lax reporting requirements of the Lobbying Disclosure Act (LDA), any survey is likely to underestimate the total number of lobbyists and money spent to influence federal laws and regulations. Trade associations, individual companies, and lobbying firms that reported spending less than \$10,000 were not included in this report. Of the entities that signed the March 2<sup>nd</sup> 2009 letter to Congress, 11 of them reported spending less than \$10,000, reported no lobbying activity for FY 2008, or were not listed in the LDA database. Past surveys indicate that at least another hundred lobbyists working for industrial chemical companies are likely to have participated in this campaign.

---

<sup>10</sup> [www.legistorm.com](http://www.legistorm.com)

<sup>11</sup> <http://www.etc.org/whoistheetc/>



The data compiled in this report reveals three layers of a multi-million dollar campaign by trade organizations, chemical companies, and lobby firms to prevent stronger regulations that could lead their customers to switch to safer, more secure chemical processes. The results indicate a clear pattern that the U.S Chamber of Commerce and the ACC dominated the 2008 lobbying campaign against safer chemical facility requirements. The NAM, National Propane Gas Association (NPGA), Croplife America and Edison Electric are other notable leaders of the 2008 campaign. (see [Appendix D](#)).

Amongst the 2008 lobbying reports, the ACC itself reported spending only \$3.9 million on all lobbying out of an annual budget of \$100 million (see [Appendix D](#)).<sup>12</sup> The ACC also reported hiring three lobby firms that brought their total reported lobbying to \$4.5 million for 2008. The LDA's lack of transparency in disclosing the priority of issues lobbied on by trade associations, companies and lobby firms creates great uncertainty when attempting to accurately estimate expenditures on chemical security or any specific bill or issue. Furthermore, given the extensive resources available to the ACC, the priority given to chemical security in 2007, and the average industry lobbyist salary in Washington D.C. (approximately \$100,000-\$250,000), even the estimated high range of the ACC's reported direct lobbying on chemical security may only capture a fraction of their influence.

To demonstrate the ambiguity of LDA reported, we made three estimates of total lobbying expenditures ranging from \$145,000 to \$1.7 million spent by the ACC on chemical security lobbying. Even our estimate of \$1.7 million is likely to underestimate the ACC's total spending to influence chemical security regulations and legislation in 2008 (see Appendices [H](#) and [I](#)).<sup>13</sup>

Not all industry groups reported spending the same amount of money fighting comprehensive reform. The top twenty percent of surveyed lobbying entities account for the majority of total spending in 2008 (See [Appendix D](#)). These entities included the U.S. Chamber of Commerce, as the top spender, followed closely by the ACC. This activity is likely to dramatically increase in 2009. In a statement released on June 8, 2009 by Chemical Week, the ACC's shift towards more intensive anti-regulatory advocacy is summarized: "ACC will scale back the broader public outreach...in favor of targeted support for ACC's key priorities. These priorities include changes to federal chemical management policy, including an overhaul of the Toxic Substances Control Act; climate policy and the impact it could have on energy supply; rail reform; and chemical plant security."<sup>14</sup>

Of the 31 lobbyists hired in total by the ACC, 25 of them were listed as working on chemical security issues according to their LDA reports. Similarly Dow and DuPont directed almost half of their hired lobbyists towards lobbying on chemical security issues. While the ACC, Dow and DuPont did not sign the March 2009 letter to Congress, they were among the top 10 entities that led efforts to weaken current

---

<sup>12</sup> [http://www.sourcewatch.org/index.php?title=American\\_Chemistry\\_Council](http://www.sourcewatch.org/index.php?title=American_Chemistry_Council)

<sup>13</sup> [http://www.cbsalary.com/salary\\_chart.aspx?specialty=Lobbyist+Top&kw=Senior%20Lobbyist&cty=Washington&jn=jn024&sid=DC&edu=&tid=1916&ns=1](http://www.cbsalary.com/salary_chart.aspx?specialty=Lobbyist+Top&kw=Senior%20Lobbyist&cty=Washington&jn=jn024&sid=DC&edu=&tid=1916&ns=1)

<sup>14</sup> Robert Westervelt, Chemical Week, June 8 2009, [www.chemweek.com](http://www.chemweek.com)

CFATS standards and opposed more stringent chemical facility security legislation in 2008.

## V. LDA DEFINITION OF LOBBYING

The lack of transparency in industry reporting on lobby disclosure forms makes it impossible to accurately determine exactly how much is spent on any specific bill or legislation. The LDA's definition of lobbying activities is as follows:

*"Lobbying Activities: Lobbying contacts and any efforts in support of such contacts, including preparation or planning activities, research and other background work that is intended, at the time of its preparation, for use in contacts and coordination with the lobbying activities of others.*

*Lobbying Contact: Any oral, written, or electronic communication to a covered official that is made on behalf of a client with regard to the enumerated subjects at 2 U.S.C. § 1602(8)(A). Note the exceptions to the definition at 2 U.S.C. § 1602(8)(B).<sup>15</sup>*

This narrow definition of lobbying does not include disclosure of the full amount of money spent by a company or association to influence public opinion and ultimately public officials and the legislation they write. This report does not consider the many other ways these businesses influence Congress and the Executive Branch, for example, public relations, paid media, political-action-committees (PACs), honorariums and grassroots lobbying. Each of these can easily have large budgets. In addition, industry can legally spend millions on "grassroots" lobbying at the local level, all of which is tax deductible as a business expense and is not required to be registered through the LDA.

## VI. LEGISLATIVE CONTEXT

Since the Bush administration first scuttled an EPA chemical plant security proposal in 2002, Congress has failed to enact comprehensive legislation on this issue. Instead, in the fall of 2006 Congress passed a 740 word interim law as a "rider" on the FY 2007 Department of Homeland Security (DHS) Appropriations bill. The bill was supported by the chemical industry but opposed by Democrats who favored the comprehensive legislation that had been reported out of the House and Senate Homeland Security committees. In 2006, when then Senator Obama introduced legislation, very similar to what is under consideration in Congress today, he said:

***"It's a travesty that the 9/11 Commission, in looking at what has been done over the last five years gave us basically an "F" when it came to chemical plant security... So what I've done, working with Senator Frank Lautenberg from New Jersey, is to introduce legislation that would protect our communities from this potential threat but in a***

---

<sup>15</sup> [http://www.senate.gov/legislative/common/briefing/lobby\\_disc\\_briefing.htm](http://www.senate.gov/legislative/common/briefing/lobby_disc_briefing.htm)



***balanced way. There are features in this bill that I think have to be part of any chemical security legislation passed by this Congress...What that means is that chemical facilities would have to take steps to improve security including improving barriers, containment, mitigation, safety training, and where possible, use safer technology. That is known as Inherent Safer Technology, or 'IST,' what that means is essentially, plants should use less toxic chemicals, and employ safer procedures where possible....***

***...unfortunately, the chemical lobby is one of the most powerful ones in Washington. It spends more money than just about any other lobby, including the pharmaceutical industry. They have dragged their feet, in terms of wanting to move this issue forward. I understand that there is no company out there that wants to be regulated, companies are generally allergic to any intrusion in their business decisions, but this is something of such great importance that we can't afford to rely solely on voluntary measures."***

Even though the interim law was passed with the expectation that Congress would enact permanent legislation before it expires on October 4, 2009, in 2008 the chemical industry lobby convinced Congress to postpone action on permanent legislation for another year. In addition the industry successfully pressured the DHS to issue weakened regulations known as the Chemical Facility Anti-Terrorism Standards of 2008 (CFATS).

Since 9/11, the chemical industry lobby, led by the ACC, NAM, and the U.S. Chamber of Commerce, has succeeded in delaying the enactment of permanent, comprehensive chemical security legislation. In each Congress since 9/11, this coalition has derailed or crippled comprehensive legislation. However, after unsuccessful efforts to delay, weaken, and kill H.R. 5577, the House Homeland Security Committee adopted the bill on March 6, 2008. If it had been enacted, this bill would have conditionally required implementation of safer, cost-effective technologies at high-risk plants and for the first time established a comprehensive security program for one of the nation's most vulnerable sectors.

Since CFATS was enacted, the chemical industry lobby has pushed to make this temporary "rider" a permanent law. A March 2, 2009 letter from 31 trade associations representing the chemical industry again formalized their demand on Congress to make permanent the fatally flawed CFATS regulations.

Among the lobby groups on the March 2<sup>nd</sup> letter was the National Association of Manufacturers (NAM). In a break with its industry allies in the NAM, members of the Association of American Railroads (AAR), whose member companies are the largest shippers of bulk poison gases, issued a February 27<sup>th</sup>, 2008 statement which concluded:

***"We can no longer continue to risk the lives of millions of Americans by using, transporting, and storing highly toxic chemicals when***

***there are safer alternatives commercially available. It is time for the nation's big chemical companies to stop making the dangerous chemicals that can be replaced by safer substitutes or new technologies currently in the marketplace...And if they won't do it, Congress should do it for them in the Chemical Facility Anti-Terrorism Act of 2008."***

In June 2009 the House Committee on Homeland Security held a legislative hearing on HR 2868, the Chemical Facilities Anti-Terrorism Act of 2009. Republicans, who ultimately voted against the entire bill, urged the committee to wait until next year to consider legislation and then offered numerous amendments to weaken the bill. After three days of voting, the Homeland Security Committee rejected the most crippling amendments offered on behalf of the chemical industry. These included proposals to delete entire sections of the bill that would require the use of safer chemical processes at the highest- risk plants. Industry lobbyists however, won four amendments designed to delay or undermine requirements to use safer chemicals or processes. Taken together, these four amendments will allow high-risk plants to delay, resist, or avoid using safer chemical processes that are already widely in use to eliminate risks to millions of Americans.

The four amendments are:

1. An amendment by Rep. Steve Austria (R-OH) that could exempt the highest risk plants in the country from implementing safer chemical processes if they meet the Small Business Administration definition of a "small business concern," a designation which the DHS will decide after a one year review. Rep. Jackson-Lee (D-TX) warned that forty percent of U.S. chemical plants could qualify as a "small business concern" using the SBA definition.
2. An amendment by Rep. Charlie Dent (R-PA) to delay the implementation of safer chemicals processes at any plant until the DHS conducts a "detailed analysis" of the costs of using safer chemical processes. This study would not include the many benefits of safer chemicals such as jobs created, reduced liability, fewer regulatory obligations, longer-term profitability and extended plant life and profitability. This amendment was also opposed by organized labor groups.
3. A second amendment by Rep. Dent (R-PA) that could exempt the highest risk chemical facilities from implementing safer chemical processes if they can show that switching to safer chemical processes would reduce their operations or workforce. Again, this amendment fails to account for the economic benefits of safer chemical processes such as new jobs created for conversion and extended plan life and profitability.
4. An amendment by Rep. Dan Lungren (R-CA) that would add a second appeals process allowing chemical facilities to take DHS to court if they choose to resist using safer chemical processes. This amendment could potentially tie up the

DHS in court and distract the Department from safe guarding communities at risk.

As of this printing, the House Energy and Commerce Committee expects to take up the bill in September 2009.

During their time served in Senate both President Obama and Vice President Biden were champions of comprehensive chemical security legislation. Both advocated for safer chemical technologies and processes to safeguard against chemical facility security threats and the associated risks to the lives of thousands of Americans. President Obama also spoke out on the issue during his candidacy for President.

***"There are other ways to reduce risk that need to be part of the equation. Specifically, by employing safer technologies, we can reduce the attractiveness of chemical plants as a target." --- Senator Barack Obama, March 30, 2006***

***"I believe that requiring chemical facilities to transition to safer technologies whenever it is practical should be a priority that we establish. Doing this would completely and permanently eliminate the threat to millions of Americans." --- Senator Joe Biden, June 21, 2006***

Additional statements as well as video of then senators Obama and Biden on chemical security can be found at:

<http://www.greenpeace.org/usa/campaigns/toxics/toxic-chemical-threats>.

The new Administration and Congress have a limited amount of time to fulfill the promise of enacting legislation that protects the millions of Americans. The 2006 interim law expires October 4, 2009. If the 2010 FY DHS Appropriations bill is enacted with the inclusion of a one-year extension of CFATS (as proposed), the 111<sup>th</sup> Congress will have until October 4, 2010 to enact permanent comprehensive legislation.

## **VII. METHODOLOGY**

This report reveals just three of the many layers of a successful multi-million dollar campaign to derail comprehensive chemical facility security legislation in 2008. The layers include trade association lobbyists, affiliated company lobbyists, and the lobby firms hired by both of these groups.

All lobby reports on the trade association letter signatories, etc. were gathered from the website <http://soprweb.senate.gov>, the official site of the Office of the Secretary of the Senate. While the Lobby Disclosure Act (LDA) of 1995 requires all lobbying entities to register and report publicly the amount spent on a quarterly basis, it fails to require any specific information on the amount of money spent on a single issue or piece of legislation. Instead the reports give an aggregate total of expenditures for a quarterly period for all lobbying. Specific legislation or topics are considered "specific issues" and are listed under "general issue" categories within the lobbying disclosure reports. While

the LDA reporting procedure requires entities to list the specific issues that were lobbied on, it does not reveal exactly which lobbyists worked on which issue(s), in particular. Each lobbyist may lobby on a variety of issues, but their reports do not disclose the priority of any issue within a given category. This survey only includes lobbyists who were listed under categories where chemical security issues were also listed. Entities that reported annual lobbying expenses equaling or more than \$10,000 were included in this survey. Where entities reported spending "less than \$10,000," Greenpeace recorded their expenditure as zero dollars.

## **Estimating Chemical Security Lobbying and Expenditures**

Because the LDA does not require lobbyists to disclose how much of their time or expenses are devoted to any specific issue, nor the priority of certain issues over others, it is impossible to accurately estimate spending on chemical security. The lack of transparency in the LDA system creates great uncertainty. In order to combat such uncertainty, we analyzed LDA lobby reports from three different angles. This resulted in a range of three chemical security expenditure estimates. The high range value was based on estimated spending according to the total number of chemical security lobbyists registered. The mid and low range values were based on the number of categorical (general) and specific issues listed, and the amount which directly related to chemical security legislation in 2008.

To determine the amount of lobbyists working on chemical security, lobbyists were considered where they were listed under categories where specific issues relating to chemical security were reported. The total amount of all lobbyists listed (for every issue reported) was compiled, and from that aggregate, lobbyists who worked on chemical security issues were counted. A list of all chemical security lobbyists can be found in [Appendix F](#). The total amount of lobbyists employed by the 31 lobbying entities surveyed in this report was 353, 169 of which were registered to work on chemical security issues in 2008.

## **Range of Three Estimates of Chemical Security Lobbying**

To estimate a **high range** value of estimated chemical security spending based on the number of lobbyists the following steps were taken for each trade organization, company and lobby firm surveyed (see Figure 1, [Appendix G](#)):

1. Counted the total amount of lobbyists registered for each quarter; summed all four quarters to total the amount of lobbyists registered for 2008
2. Divided the annual amount of expenditures reported for 2008 by the total number of lobbyists registered, which yielded an "amount available per each lobbyist."
3. Multiplied the amount available for each lobbyist by the total number of chemical security lobbyists, defined as lobbyists who were listed under categories where chemical security issues were also listed

To estimate a **mid range** amount of chemical security lobbying expenditures, the following steps were taken for each trade organization, company and lobby firm surveyed (see Figure 2, [Appendix G](#)):

1. Counted the total number of “general issues” listed under each general category for each quarter during the 2008 fiscal year.
2. Divided the quarterly expenditure reported by the total number of general issues listed for the respective quarter to yield the estimated amount spent per general issue.
3. Multiplied the estimated amount spent per general issue by the total amount of chemical security related general issues listed for the given quarter.
4. Steps 1-3 were repeated for each quarter to give a total of annual spending on lobbying, yielding a grand total of chemical security spending and a percentage amount to reflect how much of the budget went towards lobbying on chemical security legislation for 2008.
5. The final mid range amount was calculated by summing up the respective chemical security expenditure totals for each trade organization and lobby firm.

To estimate a **low range** amount of chemical security lobbying expenditures, the following steps were taken for each trade organization, company and lobby firm surveyed (see Figure 3, [Appendix G](#)):

1. Counted the total number of “specific issues” listed under each general category for each quarter during the 2008 fiscal year.
2. Divided the quarterly expenditure reported by the total number of specific issues listed for the respective quarter to yield the estimated amount spent per specific issue.
3. Multiplied the estimated amount spent per specific issue by the total amount of chemical security related specific issues listed for the given quarter.
4. Steps 1-3 were repeated for each quarter to give a total of annual spending on lobbying, a grand total of chemical security spending and a percentage amount to reflect how much of the budget went towards lobbying on chemical security legislation for 2008.
5. The final low range amount was calculated by summing up the respective chemical security expenditure totals for each trade organization and lobby firm.

March 2, 2009

Dear Member of Congress,

We represent American businesses and local city services that provide millions of jobs and our national infrastructure. Protecting our communities and complying with federal security standards is a top priority for us.

We support straightforward legislation to reauthorize the DHS chemical facility security standards enacted by Congress in 2006. We also support Congress enacting into statute the regulatory framework that the Department of Homeland Security (DHS) carefully established and is now enforcing, known as the "Chemical Facility Anti-Terrorism Standards." Removing the sunset date and making the chemical security regulations permanent would provide the certainty needed to both protect our citizens and enable our economic recovery.

However, we strongly urge you to oppose disrupting this security program by adding provisions that would mandate government-favored substitutions, weaken protection of sensitive information, impose stifling penalties for administrative errors, create conflicts with other security standards or move away from a performance (or risk-based) approach.

For example, last year's "Chemical Facility Anti-Terrorism Act" could have caused disruptions of new federal security standards and reduced jobs in the short term, and in the long term weakened infrastructure protection and economic stability.

Our top concern is that legislation could go beyond security protections by creating a mandate to substitute products and processes with a government-selected technology. Congressional testimony found that this could actually increase risk to the businesses that the bill intends to protect. Such a standard is not measurable and would likely lead to confusion, loss of viable products, prohibitive legal liability, and business failures.

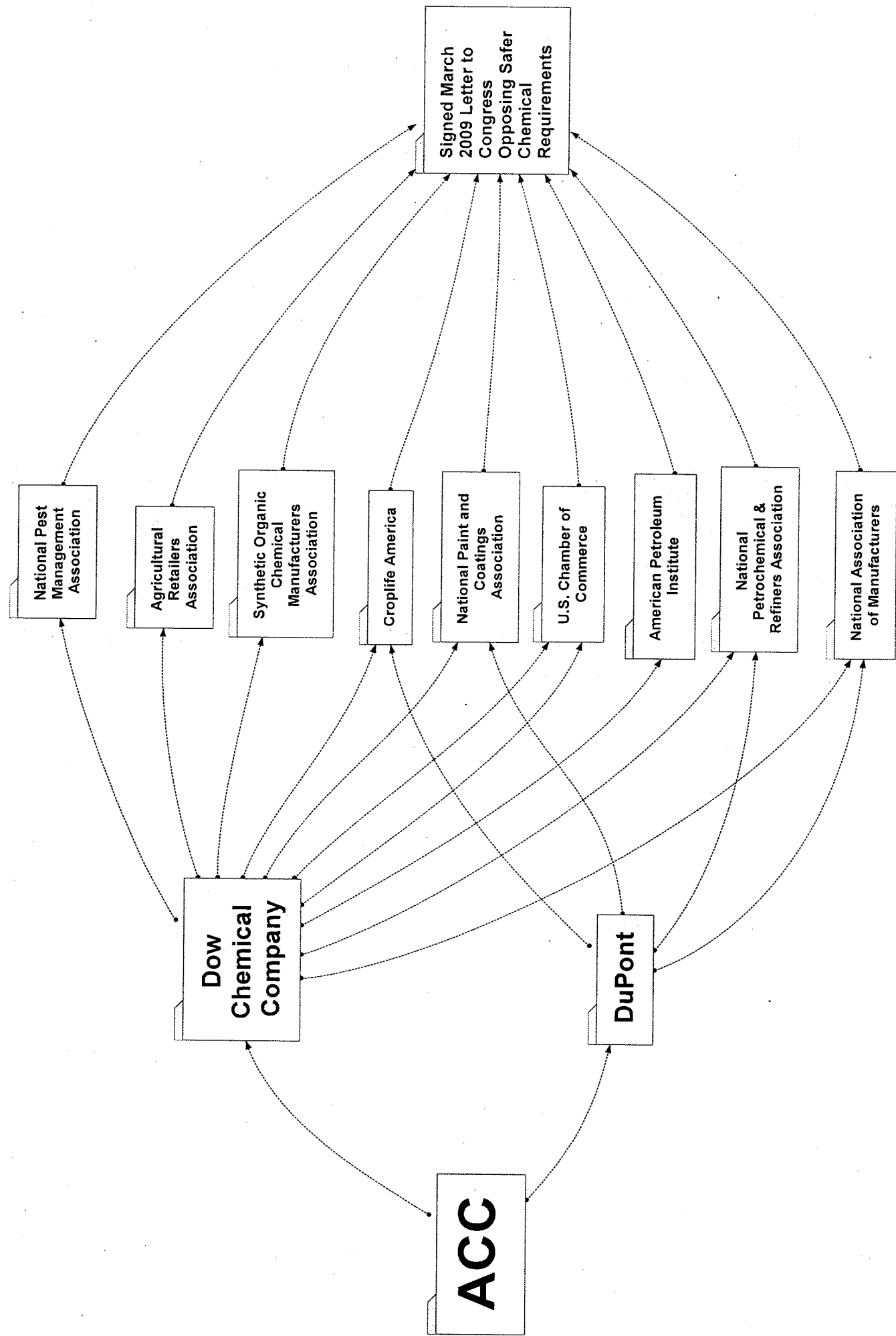
We ask that you ensure that any security legislation avoid overlap and conflict with existing federal security requirements, such as the U.S. Coast Guard's "Maritime Transportation Security Act." Any proposal must also protect from release any sensitive security information on site vulnerability.

Companies in thousands of communities are complying with the landmark new DHS chemical security standards while continuing to provide essential products and services for our daily lives. We believe that counter-productive adjustments to the current law would undermine security and endanger businesses in communities all around the country. Thank you for your consideration of our views.

Agricultural Retailers Association  
American Exploration & Production Council  
American Farm Bureau Federation  
American Forest & Paper Association  
American Petroleum Institute  
American Trucking Associations  
Chemical Producers and Distributors Assn  
Consumer Specialty Products Association  
Croplife America  
Edison Electric Institute  
Environmental Technology Council  
Institute of Makers of Explosives

International Assn of Drilling Contractors  
International Assn of Refrigerated Warehouses  
International Dairy Foods Association  
International Liquid Terminals Association  
Interstate Natural Gas Association of America  
Midwest Food Processors Association  
National Agricultural Aviation Association  
National Association of Chemical Distributors  
National Association of Manufacturers  
National Mining Association  
National Oilseed Processors Association

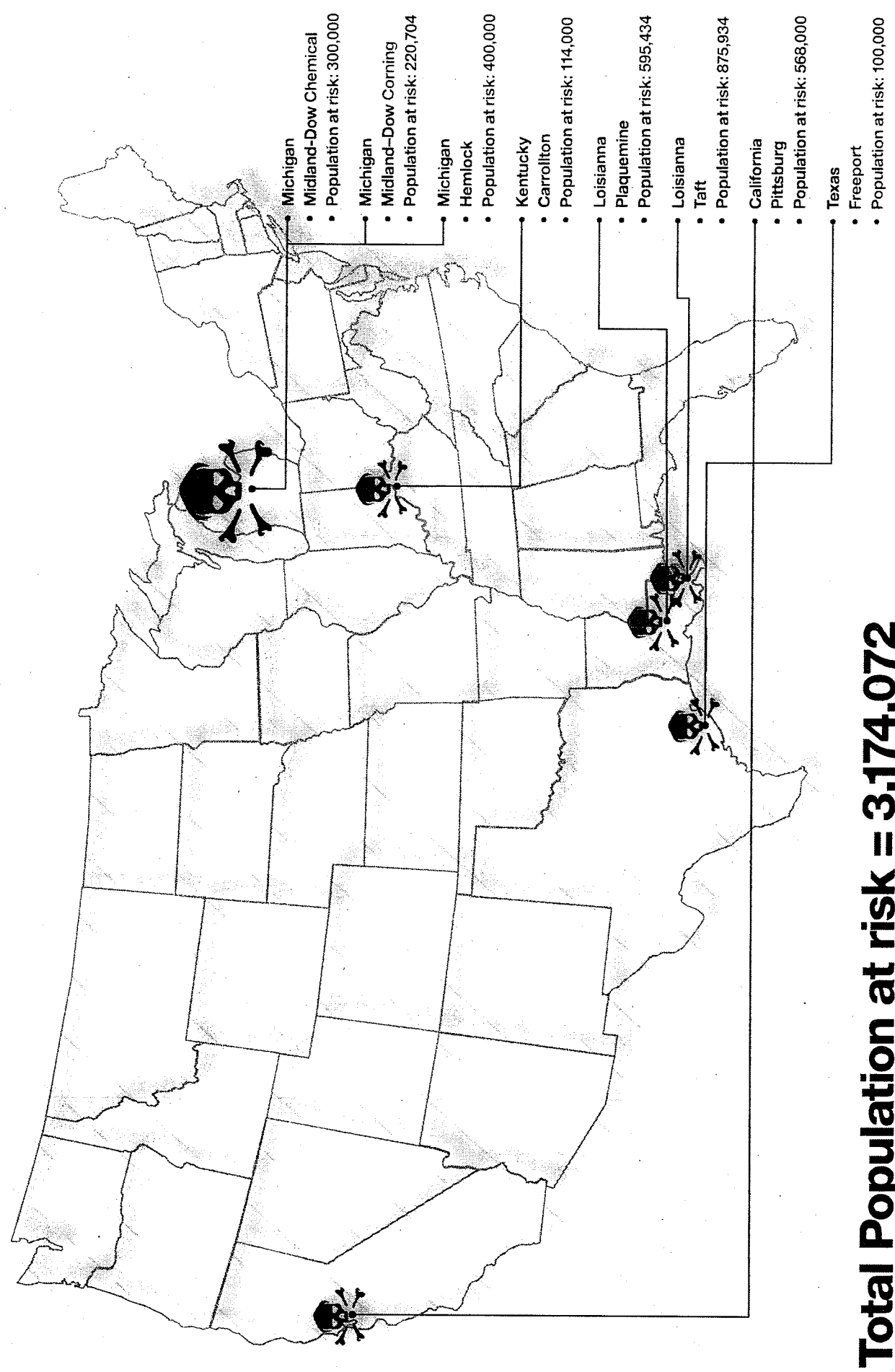
National Paint and Coatings Association  
National Pest Management Association  
National Petrochemical & Refiners Assn  
National Propane Gas Association  
North American Millers' Association  
Petroleum Equipment Suppliers Association  
Petroleum Marketers Association of America  
Synthetic Organic Chemical Manufacturers Assn  
The Fertilizer Institute  
USA Rice Federation  
U.S. Chamber of Commerce





# Will Dow Chemical support legislation to eliminate these risks?

Eight Worst Case Disasters at Dow Chemical Plants



\*Dow Chemical Risk Management Plans (RMP) submitted to the Environmental Protection Agency



702 H Street, NW, Suite 300, Washington, DC 20001

Tel: 202-462-1177 • Fax: 202-462-4507

1-800-326-0959 • [www.greenpeaceusa.org](http://www.greenpeaceusa.org)

March 10, 2009

Charles O. Holliday, Jr., CEO  
E.I. du Pont De Nemours and Company  
1007 Market Street  
Wilmington, Delaware 19891

Dear Mr. Holiday;

We would like to meet with you to discuss du Pont's use of chlorine gas and its resulting potential liabilities and regulatory obligations. To make sure that du Pont is fully aware of these liabilities, we have attached a comprehensive list of more than 50 reports from over 40 authoritative sources -- including excerpts on the hazards inherent to the bulk storage and use of chlorine gas. These sources include the Association of American Railroads, Brookings Institute, Center for American Progress, Chlorine Institute, Congressional Research Service, Federal Bureau of Investigation, National Research Council, U.S. Government Accountability Office and the U.S. Homeland Security Council. In addition, please note the hundreds of examples of chemical facilities that secured their plants by converting to safer technologies, which eliminated the risk of a catastrophic release. Knowing about these foreseeable risks and failing to act to eliminate them could result in even greater liability for du Pont in the future.

As du Pont reported in its February 12, 2009 10K Report to the Securities Exchange Commission (SEC) **"terrorism"** was listed among the factors that **"could seriously impact the company's future revenue and financial condition and increase costs and expenses."**

In fact, du Pont's liability for such a disaster could be "a company ending event." Several chemicals are capable of catastrophic damage, but chlorine gas is one the most inherently dangerous high risk substances that du Pont uses. In fact, four du Pont plant Risk Management Reports (RMP) to the Environmental Protection Agency (EPA) show that these four plants put between 66,000 and 2 million people at risk of a catastrophic release of chlorine gas (see attached list). Together these four du Pont plants put more than 2.3 million people at risk who live and work in the "vulnerability zones" reported to the EPA. In addition to the human tragedy, the liability to du Pont could potentially exceed the 9/11 attacks. According to the New York City Comptroller, economic impacts of the 9/11 attack were \$94.8 billion:  
[www.comptroller.nyc.gov/bureaus/bud/reports/impact-9-11-year-later.pdf](http://www.comptroller.nyc.gov/bureaus/bud/reports/impact-9-11-year-later.pdf)

Du Pont facilities are also subject to the new Chemical Facility Anti-Terrorism Standards (CFATS) issued by the Department of Homeland Security (DHS) which developed interim regulations for "high risk" chemical facilities. In defining the consequences of an attack compared to the accident scenarios reported to the EPA above, the DHS warns that, **"The key difference is that they may involve effects that are more severe than expected with accidental risk."** As a result, the DHS recommends that facilities use a conservative model in calculating the consequences (fatalities, injuries, property & economic damage) of a successful attack. Government sources have estimated a range of potential casualties from 100,000 (U.S. Naval Research Laboratory) to over 2.4 million (U.S. Army Surgeon General).

As you know, all of these hazards are unnecessary and preventable. Ideally, du Pont could switch to safer products and processes. Such a conversion would not only eliminate du Pont's

enormous potential liability (discussed above) but would also reduce or eliminate regulatory compliance and insurance costs associated with chlorine gas.

If, however, du Pont chooses to continue processes that require the use of chlorine gas, there are safer ways to use chlorine that do not involve the storage and transport of chlorine gas in bulk. For example, in December 2008 Dow Chemical announced such a program in the San Francisco Bay area. This is not the most preferred option, but it will result in a dramatic reduction in both risk and liability compared to the ongoing use and storage of 90-ton rail cars of chlorine gas in a large urban area.

Since 9/11, at least 220 facilities have converted to safer technologies. More than 87 percent of those interviewed said their conversion costs ranged from less than \$100,000 to \$1 million or less. A third of those surveyed said they expected to save money. The Center for American Progress has produced several reports documenting the success stories of plants that have converted to safer technologies and the outstanding risks posed by facilities still using toxic by inhalation (TIH) gases. These include the April 2006 report on the hundreds of facilities which have recently converted to safer technologies:

[http://www.americanprogress.org/issues/2006/04/b681085\\_ct2556757.html/chem\\_survey.pdf](http://www.americanprogress.org/issues/2006/04/b681085_ct2556757.html/chem_survey.pdf)

Given these risks, their potential liability, and widely available safer alternatives, it would make good business sense to learn that du Pont already has plans to convert its bulk use of chlorine gas to safer technologies.

As you also know, the DHS regulations are very limited and will expire on October 4, 2009. Congress is now considering permanent legislation that could provide more certainty for du Pont and other businesses using TIHs. The current interim law actually bars the DHS from requiring any specific security measures including the most effective security measures: safer technologies. New legislation could correct this. Last year the House Homeland Security Committee adopted H.R. 5577, which required the highest risk (Tier 1) facilities to "reduce the consequences of an attack." This bill also allowed each facility to choose the safest, most appropriate technology to reduce the consequences of an attack at their plant and allowed exceptions for in-feasibility and onerous costs.

We would also like to discuss du Pont's current position regarding chemical security legislation. Du Pont is a member of the American Chemistry Council (ACC) and the National Association of Manufacturers (NAM), which have lobbied against requiring the use of safer technologies and for making the weak temporary statute permanent. In 2008 du Pont reported spending over \$4 million on lobbying with at least four lobbyists available to lobby on chemical security plus one representing du Pont at Phillipsbury, Winthrop, Shaw and Pittman. In addition to using safer technologies at du Pont facilities, we would like to discuss shifting du Pont's lobbying resources to support for legislation similar to H.R. 5577.

Other NAM members disagree with the NAM on this legislation. For example, in February 2008, the **Association of American Railroads (AAR) issued a statement saying, "It's time for the big chemical companies to do their part to help protect America. They should stop manufacturing dangerous chemicals when safer substitutes are available. And if they won't do it, Congress should do it for them."**

A growing number of political leaders agree with the AAR. In a March 2006 floor statement, Senator Obama said, **"...there are other ways to reduce risk that need to be part of the equation. Specifically, by employing safer technologies [IST], we can reduce the**

***attractiveness of chemical plants as a target...Each one of these methods reduces the danger that chemical plants pose to our communities and makes them less appealing targets for terrorists."***

As you know, the September 11<sup>th</sup> terrorist attacks used our own infrastructure against us with tragic results. The attacks also demonstrated that tight perimeter security, such as in the case of the Pentagon, is incapable of preventing such attacks. Should a chemical plant be targeted, a truck bomb, a small plane, helicopter or a high powered rifle would easily render any "target hardening" or fence-line security useless. You told the media in June 2007, ***"I feel very comfortable that we've taken all the reasonable steps, but obviously if someone wants to fly an airplane into a plant, it's very hard to guard against it."***

The vulnerability of U.S. chemical plants to terrorism and serious accidents such as the 1984 disaster in Bhopal India, which killed 20,000 people, is widely recognized. The magnitude of these risks surpass the 9/11 attacks. Once released, these gases can remain dangerous for up to 14 miles in an urban area (20 miles in a rural area) and put the lives of millions of people at risk. U.S. chemical facilities were never designed to defend against terrorist attacks, and predicting where an attack will take place is a fool's errand. No one predicted that Timothy McVeigh would attack the Federal Building in Oklahoma City in 1995, killing 168 innocent people.

The manner in which people would be killed and injured is terrifying. Poison gases such as chlorine will literally melt the lungs of its victims causing them to drown in their own lung fluid (pulmonary edema). Survivors would be left with life-long disorders.

Following the 9/11 attacks, The Washington Post reported that 9/11 ring leader, Mohamed Atta visited a Tennessee chemical plant asking lots of questions (December 16, 2001). In 2007, at least five successful terrorist attacks in Iraq used relatively small (150 to 250 pound) cylinders of chlorine gas to kill dozens of people. In 2007, thefts of 150 pound cylinders of chlorine gas occurred in California and Texas, prompting the DHS to brief local bomb squads and chemical plants across the country. (April 24, 2007 USA Today). The time for fundamental preventive action, to safeguard American communities, is long overdue.

We look forward to meeting with you, at your earliest convenience, to discuss any plans du Pont may have for converting its facilities and supporting legislation that will ensure the use of the safest technologies wherever feasible. In the meantime, please review the attached list of authoritative sources on the hazards of chlorine gas, as well as the hundreds of examples of facilities that have secured their plants by converting to safer technologies that eliminate the risk of a catastrophic release.

Thank you.

Sincerely,

Rick Hind  
Legislative Director, Greenpeace  
(202) 319-2445  
[rick.hind@wdc.greenpeace.org](mailto:rick.hind@wdc.greenpeace.org)



For Immediate Release



**K2 Pure Solutions to Build Bleach Plant at Dow Site in Pittsburg, California**  
*New Facilities to Produce Raw Materials for Water Treatment and Dow's Crop Protection Business*

**Midland, Michigan – December 17, 2008** –The Dow Chemical Company (Dow) and K2 Pure Solutions (K2) have announced an agreement for K2 to build and operate a bleach plant at Dow's Pittsburg, California site. The new plant will serve municipal water treatment markets in Northern California.

Furthermore, K2 will lease to Dow an additional facility, which K2 will operate to generate chlorine and caustic soda for use by Dow via pipeline. Dow will use these materials to manufacture crop protection products at its Pittsburg, California site. K2 will fund construction of this facility on land leased from Dow. As part of the agreement, Dow will provide necessary raw materials and essential infrastructure for this leased facility.

"When complete, the project with K2 will provide Dow with a strategically located, low-cost raw material source for its growing agricultural business," said John Sampson, global business director, Dow Chlor-alkali. "In addition, the project will allow us to strengthen an essential, basic raw material supply, while sharing capital costs and improving our cost structure through further integration at the Pittsburg site. This is consistent with Dow's asset-light strategy for fundamental feedstock investments that support the growth of downstream Performance businesses, such as agricultural chemicals."

"K2 is pleased to work with Dow, a global leader in the chemical industry and begin operations in Pittsburg with such a large reputable company," said K2's Executive Chairman, David Cynamon. "This 20-year agreement will allow K2 to satisfy the growing demand for water treatment materials in Northern California for the long-term."

The entire project, including both facilities, will have an annual capacity of 460 million pounds of chlor-alkali products, with initial bleach production expected in the fourth quarter of 2010.

- more -

**News Release**

**K2 Announces Bleach Plant**

Page 2 of 2

"K2 will utilize Inherently Safe salt-to-bleach technology, an emerging, sustainable process that utilizes salt, water and electricity as the principle raw materials necessary to produce bleach and chlor-alkali products" said Cynamon. "In addition, K2 will purchase hydrogen from Dow for reuse in its process for a number of applications including use as a clean fuel that avoids the emission of CO<sub>2</sub>, a greenhouse gas."

**About Dow**

With annual sales of \$54 billion and 46,000 employees worldwide, Dow is a diversified chemical company that combines the power of science and technology with the "Human Element" to constantly improve what is essential to human progress. The Company delivers a broad range of products and services to customers in around 160 countries, connecting chemistry and innovation with the principles of sustainability to help provide everything from fresh water, food and pharmaceuticals to paints, packaging and personal care products. References to "Dow" or the "Company" mean The Dow Chemical Company and its consolidated subsidiaries unless otherwise expressly noted. For more information visit: [www.dow.com](http://www.dow.com).

**About K2 Pure Solutions**

K2 Pure Solutions manufactures products essential to modern life through environmentally sustainable and Inherently Safe Technology.

K2 Pure Solutions helps provide an answer to eliminating the need to transport chlorine for water purification and disinfection by deploying and funding a North America wide network of state-of-the-art facilities utilizing inherently safe technology. K2's facilities will mitigate the potential environmental, security and operational risks associated with the transport of chlorine for water treatment by producing exceptionally pure bleach, caustic soda and other chlor-alkali products using only salt, water and electricity in the most economically viable manner.

K2 Pure Solutions was founded by David Cynamon and Howard Brodie, the founders of KIK Custom Products, North America's largest contract manufacturer of private label household bleach, personal care and household cleaning products. K2 also includes Centre Partners ([www.centreparkers.com](http://www.centreparkers.com)) among its partners; a leading middle market private equity firm with offices in New York and Los Angeles. David Cynamon and Howard Brodie have partnered with Centre Partners since 1997. For more information visit: [www.k2pure.com](http://www.k2pure.com).

###

**For Editorial Information:**

Amy Ahlich  
The Dow Chemical Company  
Chlor-Alkali Public Affairs  
Tel: 989-636-3587

Steve Smith  
Fenton Communications  
for K2 Pure Solutions  
Tel: 212.584.5000 x313

Trade Organizations, Companies and Lobbying Firms	Annual Expenditure Reported	Annual Expenditure on Chemical Security – low range (based on specific issues)	Annual Expenditure on Chemical Security- mid range (based on general issues)	Annual Expenditure on Chemical Security – high range (based on # of lobbyists)
<b>U.S Chamber of Commerce</b>	\$62,240,000.00	~\$603,741.00	~\$4,168,946.00	~\$18,417,958.00
<b>American Chemistry Council</b>	\$4,690,000.00	~\$427,633.00	~\$1,010,470.00	~\$2,540,905.00
• <i>Bob Moss &amp; Associates (hired lobby firm)</i>				
• <i>Holland &amp; Knight LLC (hired lobby firm)</i>				
• <i>Ogilvy Government Relations (hired lobby firm)</i>				
Croplife America	\$2,218,524.00	~\$334,932.00	~\$2,121,024.00	~\$2,158,524.00
• <i>The Alpine Group (hired lobby firm)</i>				
Edison Electric Institute	\$7,473,371.00	~\$266,764.00	~\$978,576.00	~\$1,601,436.00
E.I. DuPont	\$4,241,772.00	~\$232,023.00	~\$1,078,845.00	~\$3,770,464.00
The Fertilizer Institute	\$1,070,979.12	~\$226,278.00	~\$232,146.00	~\$892,480.00
Dow Chemical Company	\$5,170,000.00	~\$138,300.00	~\$189,000.00	~\$1,643,392.00
• <i>GolinHaris (hired lobby firm)</i>				
National Propane Gas Association	\$786,648.00	~\$122,234.00	~\$415,504.00	~\$786,648.00
National Mining Association	\$4,564,285.00	~\$130,528.00	~\$245,529.00	~\$1,217,140.00
National Petrochemical & Refiners Association	\$814,373.00	~\$94,972.00	~\$312,330.00	~\$592,264.00
American Forest & Paper Association	\$3,130,000.00	~\$73,036.00	~\$231,514.00	~\$670,713.00
American Petroleum Institute	\$4,849,437.00	~\$68,997.00	~\$363,838.00	~\$718,432.00
Interstate Natural Gas Association of America	\$791,881.00	~\$60,000.00	~\$96,000.00	~\$263,960.00
Synthetic Organic Chemical Manufacturers Association	\$198,186.00	~\$58,130.00	~\$64,413.00	~\$198,186.00
• <i>Conrad Law &amp; Policy Council (hired lobby firm)</i>				
American Farm Bureau Federation	\$2,670,000.00	~\$35,100.00	~\$225,359.00	~\$667,499.00
American Trucking Associations	\$1,874,729.00	~\$31,912.00	~\$468,816.00	~\$1,874,729.00
National Association of Manufacturers	\$7,450,000.00	~\$27,649.00	~\$338,545.00	~\$3,997,554.00
Petroleum Marketers Association of America	\$672,000.00	~\$27,000.00	~\$79,056.00	~\$672,000.00
International Dairy Foods Association	\$643,491.00	~\$23,857.00	~\$41,750.00	~\$321,745.00
Environmental Technology Council	\$75,000.00	~\$21,665.00	~\$25,832.00	~\$75,000.00
Agricultural Retailers Association	\$350,000.00	~\$15,710.00	~\$87,500.00	~\$350,000.00
Institute of Makers of Explosives	\$80,000.00	~\$13,214.00	~\$26,666.00	~\$80,000.00
National Association of Chemical Distributors	\$70,000.00	~\$8,158.00	~\$15,999.00	~\$70,000.00
Consumer Specialty Products Association	\$46,180.00	~\$8,000.00	~\$8,000.00	~\$23,090.00
American Exploration & Production Council	\$100,000.00	~\$2,152.00	~\$10,000.00	~\$50,000.00
<b>Total</b>	<b>~\$116,270,856.00</b>	<b>~\$3,020,073.00</b>	<b>~\$12,835,658.00</b>	<b>~\$43,654,119.00</b>

LOW Range Value  
for 2008 spending on  
chemical security

MID Range Value for  
2008 spending on  
chemical security

HIGH Range Value for  
2008 spending on  
chemical security



## Estimated Chemical Security Spending Based on Number of Chemical Security Lobbyists

TRADE ASSOCIATIONS (& associated lobby firms)	Annual Registered Lobbying Expenses	Total Number of Registered Lobbyists	Amount Available/ Lobbyist	Total Number of Lobbyists Registered under Chemical Security	Estimated Chemical Security Spending
<b>American Chemistry Council</b>	\$3,940,000.00	11	~\$358,181.00	5	~\$1,790,905.00
• <i>Ogilvy Government Relations</i>	\$240,000.00	6	~\$40,000.00	6	~\$240,000.00
• <i>Bob Moss &amp; Associates</i>	\$120,000.00	1	~\$120,000.00	1	~\$120,000.00
• <i>Holland &amp; Knight LLC</i>	\$390,000.00	13	~\$30,000.00	13	~\$390,000.00
Agricultural Retailers Association	\$350,000.00	5	~\$70,000.00	5	~\$350,000.00
American Exploration & Production Council	\$100,000.00	2	~\$50,000.00	1	~\$50,000.00
American Farm Bureau Federation	\$2,670,000.00	28	~\$95,357.00	7	~\$667,499.00
American Forest & Paper Association	\$3,130,000.00	14	~\$223,571.00	3	~\$670,713.00
American Petroleum Institute	\$4,849,437.00	27	~\$179,608.00	4	~\$718,432.00
American Trucking Associations	\$1,874,729.00	9	~\$208,303.00	9	~\$1,874,729.00
Consumer Specialty Products Association	\$46,180.00	2	~\$23,090.00	1	~\$23,090.00
Croplife America	\$2,098,524.00	7	~\$299,789.00	7	~\$2,098,524.00
• <i>The Alpine Group (hired lobby firm)</i>	\$120,000.00	2	~\$60,000.00	2	~\$60,000.00
Edison Electric Institute	\$7,473,371.00	14	~\$533,812.00	3	~\$1,601,436.00
Environmental Technology Council	\$75,000.00	1	~\$75,000.00	1	~\$75,000.00
Institute of Makers of Explosives	\$80,000.00	1	~\$80,000.00	1	~\$80,000.00
International Dairy Foods Association	\$643,491.00	2	~\$321,745.00	1	~\$321,745.00
Interstate Natural Gas Association of America	\$791,881.00	3	~\$263,960.00	1	~\$263,960.00
National Association of Chemical Distributors	\$70,000.00	1	~\$70,000.00	1	~\$70,000.00
National Association of Manufacturers	\$7,450,000.00	41	~\$181,707.00	22	~\$3,997,554.00

## Estimated Chemical Security Spending Based on Number of Chemical Security Lobbyists

TRADE ASSOCIATIONS (& associated lobby firms)	Annual Registered Lobbying Expenses	Total Number of Registered Lobbyists	Amount Available/ Lobbyist	Total Number of Lobbyists Registered under Chemical Security	Estimated Chemical Security Spending
National Mining Association	\$4,564,285.00	15	~\$304,285.00	4	~\$1,217,140.00
National Petrochemical & Refiners Association	\$814,373.00	11	~\$74,033.00	8	~\$592,264.00
National Propane Gas Association	\$786,648.00	5	~\$157,329.00	5	~\$786,648.00
Petroleum Marketers Association of America	\$672,000.00	5	~\$134,400.00	5	~\$672,000.00
Synthetic Organic Chemical Manufacturers Association	\$188,186.00	6	~\$31,364.00	6	~\$188,186.00
• <i>Conrad Law &amp; Policy Council (hired lobby firm)</i>	\$10,000.00	1	~\$10,000.00	1	~\$10,000.00
The Fertilizer Institute	\$1,070,979.12	6	~\$178,496.00	5	~\$892,480.00
U.S Chamber of Commerce	\$62,240,000.00	98	~\$635,102.00	29	~\$18,417,958.00

COMPANIES (& associated lobby firms)	Annual Registered Lobbying Expenses	Total Number of Registered Lobbyists	Amount Available/ Lobbyist	Total Number of Lobbyists Registered under Chemical Security	Estimated Chemical Security Spending
Dow Chemical Company	\$4,680,000.00	7	~\$668,571.00	2	~\$1,337,142.00
• <i>Golin Harris</i>	\$490,000.00	8	~\$61,250.00	5	~\$306,250.00
E.I. DuPont de Nemours & Co.	\$4,241,772.00	9	~\$471,308.00	8	~\$3,770,464.00
			Total # of Chemical Security Lobbyists	169*	
			Estimated Grand Total Amount Spent on Chemical Security	~\$43,654,119.00	

\* Three lobbyists each lobbied for 2 entities, they were only counted once – see appendix E for specifics

Registered Chemical Security Lobbyists – 169 total

**Agricultural Retailers Association (ARA)**

Eberspacher, Jack  
Gupton, Richard  
Haworth, Carmen  
Samson, Jon  
Thrift, Jim

**American Chemistry Council (ACC)**

Domnitch, Carrie  
Durbin, Marty  
Gerard, Jack  
Gibson, Tom  
Perry, Brent

- **Bob Moss Associated (hired by the ACC)**

Moss, Bob

- **Holland & Knight LLC (hired by the ACC)**

Baron, Alan  
Bradner, Robert  
Buscher, John  
Davis, Jim  
Francis Watley, Shawna  
Galano, Michael  
Gold, Richard  
Koch, Karl  
Lehman, Kathryn  
Minerva, Julie  
Roberson, Joel  
Sikorski, Gerry  
Viola, Beth

- **Ogilvy Government Relations (hired by the ACC)**

Dammann, Julie  
Green, John  
Maloney, Drew  
Mercado, Moses  
Taylor, Gordon  
Williams, Jimmy

**American Exploration & Production Council**

Whitsitt, William F.

**American Farm Bureau Federation**

Adcock, Rebeckah  
Karney, Ronald  
Maslyn, Mark  
Quist, Danielle  
Rydell, Caroline  
Schlegel, Paul  
Wegmeyer, Tyler

**American Forest & Paper Association**

Harman, Donna  
Madden, Suzanne  
VanDersarl, Elizabeth

Registered Chemical Security Lobbyists – 169 total

**American Petroleum Institute (API)**

Atkins, Caroline  
Cavaney, Red  
Hayden, Lou  
Joyner, Christopher

**American Trucking Associations**

Clarke, Lesta Britton  
De La Torre, Joe  
Evans, Catherine  
Graves, Bill  
Hart, Joseph  
Holcomb, Richard  
Kelly, Jackie  
Lynch, Timothy P.  
Robinson, Michael

**Consumer Specialty Products Association**

Mairena, Mario

**Croplife America**

Bray, Kellie  
Gasperini, Frank  
Greenwood, Allen  
James, Allen  
Pittman, Darren  
Snyder, Rod  
Vroom, Jay

- **The Alpine Group (hired by Croplife America)**  
Massie, James  
Johnson, Courtney

**Dow Chemical Company**

Lundquist, Brooke\*  
Verheggen, Theodore\*

- **Golin Haris for DOW**  
Bailey, R. Lane  
Fulton, Michael C.  
Lundquist, Brooke  
Martine, Josephine  
Verheggen, Theodore

**Edison Electric Institute**

Hunt, Margaret  
Odom, James  
Steckelberg, Kathryn

**E.I. du Pont de Nemours & Co.**

Boykin, Celeste  
Kountz, Dennis  
Pannozzo, Jeff  
Parr, Michael  
Manes, Julie  
Lawler, Sharee  
Webbm Clifton  
Fritz, Jeff

Registered Chemical Security Lobbyists – 169 total

**Environmental Technology Council**

Slesinger, Scott

**Institute of Makers of Explosives**

Hilton, Cynthia

**International Dairy Foods Association**

Slominski, Jerry

**Interstate Natural Gas Association of America**

Edwards, Martin E.

**National Association of Chemical Distributors**

Gibson, Jennifer C.

**National Association of Manufacturers (NAM)**

Boerstling, Robyn

Donnelly, Shaun

Engler, John

Gillespie, Jeri

Goudie, Doug

Grant, Sean

Jessup, Meredith

Long, Patty

Lugbill, Tim

Modlin, Ryan

Neill, Jim

Newhouse, Aric

Paradise, Leann

Robinson, Catherine

Shepler, Bob

Signorino, Marc-Anthony

Smith, Keith

Timmons, Jay

Vargo, Frank

Weems, Heath

Wilson, LeAnne

Wood, Carter

**National Mining Association**

Bridgeford, Tawny

Gustafson, Julia

Hlobik, Maggie

Nolan, Rich

**National Petrochemical & Refiners Association (NPRA)**

Cooper, Jim

Drevna, Charlie

Gunnulfsen, Jeff\*

Karen, Catherine

McBride, Maurice

Scott, Greg

Sulzer, Catherine

Williams, Brendan

**National Propane Gas Association**

Caldarera, Michael

Caudill, Brian

Roldan, Richard

Squair, Philip

Troop, Michael

Registered Chemical Security Lobbyists – 169 total

**Petroleum Marketers Association of America**

Cabrera, Sherri  
Gilligan, Dan  
Morgan, Mark  
Underwood, Rob  
Wright, Brandon

**Synthetic Organic Chemical Manufacturers Association (SOCMA)**

Allmond, William  
Freisleben, Justine  
Gunnulfsen, Jeffrey  
Mechum, Sarah  
Moss, Daniel  
Newton, Daniel

- **Conrad Law Policy (hired by SOCMA)**  
Conrad, James

**The Fertilizer Institute**

Ballweg, Kris  
English, Katherine  
Guffain, Pam  
West, Ford  
Zillinger II, F. Everett

**U.S. Chamber of Commerce**

Barrett, Murphie	Kovacs, William
Beauchesne, Ann	Lawson, Peter
Brady, Andrew	Lumadue, Justin
Christman, Dan	Lundberg, Rolf
Clark, Jack	Maney, Tim
Conley, Jason	McLean, Elizabeth
Coratolo, Giovanni	Merida, Chris
Cylke, Christopher	Miller, Ashley
Donohue, Thomas	Morton, Jack
Eggers, Matthew	Regalia, Martin
Eidshaug, Ronald	Solerno, Adam
Friedl, Janet	Strong, Katie
Goldman, Jason	Thompson, Terrence
Heather, Sean	Venable, Nicole
Josten, Bruce R.	

**\*The following lobbyists were only counted once, despite having lobbied for more than one entity in 2008:**

- Jeffrey Gunnulfsen lobbied for both SOCA and NPRA
- Theodore Verheggen lobbied for Dow and GolinHaris
- Brooke Lundquist lobbied for Dow and GolinHaris

**Figure 1:** Example for deriving high range estimates of chemical security spending based on the total number of chemical security lobbyists registered

**E. I. du Pont de Nemours & Co.**

Annual Registered Lobby Expenses for 2008	Total Number of registered lobbyists	Amount Available/ lobbyist	Total number of lobbyists registered under chemical security	Amount Spent on Chemical Security
\$4,241,772.00	9	~\$471,308.00	8	~\$3,770,464.00

**Figure 2:** Example for deriving mid range estimates of chemical security spending based on the total number of specific issues relating to chemical security within LDA reports.

**E. I. du Pont de Nemours & Co.**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$810,000.00	~11	~\$73,636.00	~3	~\$220,908.00
2 <sup>nd</sup> quarter	\$1,312,000.00	~12	~\$109,333.00	~3	~\$327,999.00
3 <sup>rd</sup> quarter	\$1,059,886.00	~12	~\$88,323.00	~3	~\$264,969.00
4 <sup>th</sup> quarter	\$1,059,886.00	~12	~\$88,323.00	~3	~\$264,969.00
2008 Total Spent on Chem Lobbying					~\$1,078,845.00
2008 Total Amount Spent on General Lobbying					\$4,241,772.00
% of total spending directed towards chemical security lobbying					~25.4%

**Figure 3:** Example for deriving low range estimates of chemical security spending based on the total number of specific issues relating to chemical security within LDA reports.

**E. I. du Pont de Nemours & Co.**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$810,000.00	~60	~\$13,500.00	3	~\$40,500.00
2 <sup>nd</sup> quarter	\$1,312,000.00	~57	~\$23,017.00	3	~\$69,051.00
3 <sup>rd</sup> quarter	\$1,059,886.00	~50	~\$21,197.00	3	~\$63,591.00
4 <sup>th</sup> quarter	\$1,059,886.00	~54	~\$19,627.00	3	~\$58,881.00
2008 Total Spent on Chem Lobbying					~\$232,023.00
2008 Total Amount Spent on General Lobbying					\$4,241,772.00
% of total spending directed towards chemical security lobbying					~5.5%



**2008 MID RANGE LOBBYING EXPENDITURES ON CHEMICAL SECURITY**  
**Total Spent on Chem Security Lobbying: ~\$12,739,658.00 MID RANGE VALUE**

**American Chemistry Council (ACC)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$770,000.00	~6	~\$128,333.00	1	~\$128,333.00
2 <sup>nd</sup> quarter	\$1,440,000.00	~6	~\$240,000.00	1	~\$240,000.00
3 <sup>rd</sup> quarter	\$940,000.00	~7	~\$134,285.00	1	~\$134,285.00
4 <sup>th</sup> quarter	\$790,000.00	~7	~\$112,857.00	1	~\$112,857.00
2008 Total Spent on Chem Lobbying					~\$615,475.00
2008 Total Amount Spent on General Lobbying					\$3,940,000.00
% of total spending directed towards chemical security lobbying					~15.6%

**Bob Moss for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	\$30,000.000
2 <sup>nd</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	\$30,000.000
3 <sup>rd</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	\$30,000.000
4 <sup>th</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	\$30,000.000
2008 Total Spent on Chem Lobbying					\$120,000.00
2008 Total Amount Spent on General Lobbying					\$120,000.00
% of total spending directed towards chemical security lobbying					100%

**Holland & Knight LLC for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$80,000.00	~4	~\$20,000.00	~3	~\$60,000.00
2 <sup>nd</sup> quarter	\$130,000.00	~6	~\$21,666.00	~3	~\$64,998.00
3 <sup>rd</sup> quarter	\$100,000.00	~6	~\$16,666.00	~3	~\$49,998.00
4 <sup>th</sup> quarter	\$80,000.00	~6	~\$13,333.00	~3	~\$39,999.00
2008 Total Spent on Chem Lobbying					~\$214,995.00
2008 Total Amount Spent on General Lobbying					\$390,000.00
% of total spending directed towards chemical security lobbying					~55.1%

**Ogilvy Government Relations for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$60,000.00	~4	~\$15,000.00	~1	~\$15,000.00
2 <sup>nd</sup> quarter	\$60,000.00	~4	~\$15,000.00	~1	~\$15,000.00
3 <sup>rd</sup> quarter	\$60,000.00	~4	~\$15,000.00	~1	~\$15,000.00
4 <sup>th</sup> quarter	\$60,000.00	~4	~\$15,000.00	~1	~\$15,000.00
2008 Total Spent on Chem Lobbying					~\$60,000.00
2008 Total Amount Spent on General Lobbying					\$240,000.00
% of total spending directed towards chemical security lobbying					~25%

**DOW Chemical Company**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$540,000.00	~10	~\$54,000.00	~1	~\$54,000.00
2 <sup>nd</sup> quarter	\$790,000.00	~10	~\$79,000.00	0	\$0
3 <sup>rd</sup> quarter	\$1,980,000.00	~11	~\$180,000.00	0	\$0
4 <sup>th</sup> quarter	\$1,370,000.00	~13	~\$105,384.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$54,000.00
2008 Total Amount Spent on General Lobbying					\$4,680,000.00
% of total spending directed towards chemical security lobbying					~1.1%

**GolinHaris for DOW Chemical Company**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$160,000.00	~2	~\$80,000.00	~1	~\$80,000.00
2 <sup>nd</sup> quarter	\$110,000.00	~2	~\$55,000.00	~1	~\$55,000.00
3 <sup>rd</sup> quarter	\$110,000.00	~1	~\$110,000.00	0	~\$0
4 <sup>th</sup> quarter	\$110,000.00	~1	~\$110,000.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$135,000.00
2008 Total Amount Spent on General Lobbying					\$490,000.00
% of total spending directed towards chemical security lobbying					~27.5%

**E. I. du Pont de Nemours & Co.**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$810,000.00	~11	~\$73,636.00	~3	~\$220,908.00
2 <sup>nd</sup> quarter	\$1,312,000.00	~12	~\$109,333.00	~3	~\$327,999.00
3 <sup>rd</sup> quarter	\$1,059,886.00	~12	~\$88,323.00	~3	~\$264,969.00
4 <sup>th</sup> quarter	\$1,059,886.00	~12	~\$88,323.00	~3	~\$264,969.00
2008 Total Spent on Chem Lobbying					~\$1,078,845.00
2008 Total Amount Spent on General Lobbying					\$4,241,772.00
% of total spending directed towards chemical security lobbying					~25.4%

**Agricultural Retailers Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$50,000.00	~8	~\$6,250.00	2	~\$12,500.00
2 <sup>nd</sup> quarter	\$100,000.00	~8	~\$12,500.00	2	~\$25,000.00
3 <sup>rd</sup> quarter	\$100,000.00	~8	~\$12,500.00	2	~\$25,000.00
4 <sup>th</sup> quarter	\$100,000.00	~8	~\$12,500.00	2	~\$25,000.00
2008 Total Spent on Chem Lobbying					~\$87,500.00
2008 Total Amount Spent on General Lobbying					\$350,000.00
% of total spending directed towards chemical security lobbying					~25.0%

**American Exploration & Production Council**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.00	~6	~\$5,000.00	~1	~\$5,000.00
2 <sup>nd</sup> quarter	\$30,000.00	~6	~\$5,000.00	~1	~\$5,000.00
3 <sup>rd</sup> quarter	\$20,000.00	~3	~\$6,666.00	0	~\$0
4 <sup>th</sup> quarter	\$20,000.00	~1	~\$20,000.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$10,000.00
2008 Total Amount Spent on General Lobbying					\$100,000.00
% of total spending directed towards chemical security lobbying					~10.0%

**American Farm Bureau**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$690,000.00	~16	~\$43,125.00	~1	~\$43,125.00
2 <sup>nd</sup> quarter	\$750,000.00	~17	~\$44,117.00	~2	~\$88,234.00
3 <sup>rd</sup> quarter	\$640,000.00	~20	~\$32,000.00	~2	~\$64,000.00
4 <sup>th</sup> quarter	\$540,000.00	~18	~\$30,000.00	~1	~\$30,000.00
2008 Total Spent on Chem Lobbying					~\$225,359.00
2008 Total Amount Spent on General Lobbying					\$2,670,000.00
% of total spending directed towards chemical security lobbying					~8.4%

**American Forest & Paper Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,080,000.00	~11	~\$98,181.00	~1	~\$98,181.00
2 <sup>nd</sup> quarter	\$820,000.00	~12	~\$68,333.00	~1	~\$68,333.00
3 <sup>rd</sup> quarter	\$650,000.00	~10	~\$65,000.00	~1	~\$65,000.00
4 <sup>th</sup> quarter	\$580,000.00	~9	~\$64,444.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$231,514.00
2008 Total Amount Spent on General Lobbying					\$3,130,000.00
% of total spending directed towards chemical security lobbying					~7.4%

**American Petroleum Institute (API)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,270,000.00	~9	~\$141,111.00	~1	~\$141,111.00
2 <sup>nd</sup> quarter	\$1,020,000.00	~11	~\$92,727.00	~1	~\$92,727.00
3 <sup>rd</sup> quarter	\$1,300,000.00	~10	~\$130,000.00	~1	~\$130,000.00
4 <sup>th</sup> quarter	\$1,259,437.00	~10	~\$125,943.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$363,838.00
2008 Total Amount Spent on General Lobbying					\$4,849,437.00
% of total spending directed towards chemical security lobbying					~7.5%

**American Trucking Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$418,220.00	~8	~\$52,277.00	~2	~\$104,554.00
2 <sup>nd</sup> quarter	\$541,730.00	~8	~\$67,716.00	~2	~\$135,432.00
3 <sup>rd</sup> quarter	\$441,730.00	~8	~\$55,216.00	~2	~\$110,432.00
4 <sup>th</sup> quarter	\$473,593.00	~8	~\$59,199.00	~2	~\$118,398.00
2008 Total Spent on Chem Lobbying					~\$468,816.00
2008 Total Amount Spent on General Lobbying					\$1,874,729.00
% of total spending directed towards chemical security lobbying					~25.0%

**Consumer Specialty Products Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$16,000.00	~2	~\$8,000.00	~1	~\$8,000.00
2 <sup>nd</sup> quarter	\$20,062.51	~2	~\$10,031.25	0	~\$0
3 <sup>rd</sup> quarter	\$10,118.00	~2	~\$5,059.00	0	~\$0
4 <sup>th</sup> quarter	<\$5,000.00 (amounts <\$5k not counted)	~2	N/A	N/A	N/A
2008 Total Spent on Chem Lobbying					~\$8,000.00
2008 Total Amount Spent on General Lobbying					\$46,180.00
% of total spending directed towards chemical security lobbying					~17.3%

**Croplife America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$492,195.00	~1	~\$492,195.00	~1	~\$492,195.00
2 <sup>nd</sup> quarter	\$464,247.00	~1	~\$464,247.00	~1	~\$464,247.00
3 <sup>rd</sup> quarter	\$483,715.00	~1	~\$483,715.00	~1	~\$483,715.00
4 <sup>th</sup> quarter	\$658,367.00	~1	~\$658,367.00	~1	~\$658,367.00
2008 Total Spent on Chem Lobbying					~\$2,098,524.00
2008 Total Amount Spent on General Lobbying					\$2,098,524.00
% of total spending directed towards chemical security lobbying					~100%

**The Alpine Group for Croplife America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.00	~2	~\$15,000.00	~0	~\$0
2 <sup>nd</sup> quarter	\$30,000.00	~4	~\$7,500.00	~1	~\$7,500.00
3 <sup>rd</sup> quarter	\$30,000.00	~4	~\$7,500.00	~1	~\$7,500.00
4 <sup>th</sup> quarter	\$30,000.00	~4	~\$7,500.00	~1	~\$7,500.00
2008 Total Spent on Chem Lobbying					~\$22,500.00
2008 Total Amount Spent on General Lobbying					\$120,000.00
% of total spending directed towards chemical security lobbying					~18.7%

**Edison Electric Institute**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$2,200,000.00	~6	~\$366,666.00	~1	~\$366,666.00
2 <sup>nd</sup> quarter	\$1,973,371.00	~7	~\$281,910.00	~1	~\$281,910.00
3 <sup>rd</sup> quarter	\$1,670,000.00	~10	~\$167,000.00	~1	~\$167,000.00
4 <sup>th</sup> quarter	\$1,630,000.00	~10	~\$163,000.00	~1	~\$163,000.00
2008 Total Spent on Chem Lobbying					~\$978,576.00
2008 Total Amount Spent on General Lobbying					\$7,473,371.00
% of total spending directed towards chemical security lobbying					~13.0%

**Environmental Technology Council**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
2 <sup>nd</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
3 <sup>rd</sup> quarter	\$25,000.00	~2	~\$12,500.00	~1	~\$12,500.00
4 <sup>th</sup> quarter	\$10,000.00	~1	~\$10,000.00	~0	~\$0
2008 Total Spent on Chem Lobbying					~\$25,832.00
2008 Total Amount Spent on General Lobbying					\$75,000.00
% of total spending directed towards chemical security lobbying					~34.4%

**Institute Makers of Explosives**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
2 <sup>nd</sup> quarter	\$20,000.00	~2	~\$10,000.00	~1	~\$10,000.00
3 <sup>rd</sup> quarter	\$20,000.00	~1	~\$	0	~\$0
4 <sup>th</sup> quarter	\$20,000.00	~2	~\$10,000.00	~1	~\$10,000.00
2008 Total Spent on Chem Lobbying					~\$26,666.00
2008 Total Amount Spent on General Lobbying					\$80,000.00
% of total spending directed towards chemical security lobbying					~33.3%

**International Dairy Foods Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$167,000.00	~4	~\$41,750.00	~1	~\$41,750.00
2 <sup>nd</sup> quarter	\$180,000.00	~4	~\$45,000.00	~0	~\$0
3 <sup>rd</sup> quarter	\$110,000.00	~5	~\$22,000.00	~0	~\$0
4 <sup>th</sup> quarter	\$186,491.00	~6	~\$31,081.00	~0	~\$0
2008 Total Spent on Chem Lobbying					~\$41,750.00
2008 Total Amount Spent on General Lobbying					\$643,491.00
% of total spending directed towards chemical security lobbying					~6.5%

**Interstate Natural Gas Association of America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$300,000.00	~5	~\$60,000.00	~1	~\$60,000.00
2 <sup>nd</sup> quarter	\$180,000.00	~5	~\$36,000.00	~1	~\$36,000.00
3 <sup>rd</sup> quarter	\$151,881.00	~4	N/A	N/A	N/A
4 <sup>th</sup> quarter	\$160,000.00	~4	N/A	N/A	N/A
2008 Total Spent on Chem Lobbying					~\$96,000.00
2008 Total Amount Spent on General Lobbying					\$791,881.00
% of total spending directed towards chemical security lobbying					~12.1%

**National Association of Chemical Distributors**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
2 <sup>nd</sup> quarter	\$20,000.00	~6	~\$3,333.00	~1	~\$3,333.00
3 <sup>rd</sup> quarter	\$10,000.00	~5	~\$2,000.00	~1	~\$2,000.00
4 <sup>th</sup> quarter	\$20,000.00	~5	~\$4,000.00	~1	~\$4,000.00
2008 Total Spent on Chem Lobbying					~\$15,999.00
2008 Total Amount Spent on General Lobbying					\$70,000.00
% of total spending directed towards chemical security lobbying					~22.8%

**National Association of Manufacturers (NAM)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$2,230,000.00	~20	~\$111,500.00	~1	~\$111,500.00
2 <sup>nd</sup> quarter	\$2,910,000.00	~19	~\$153,157.00	~1	~\$153,157.00
3 <sup>rd</sup> quarter	\$1,330,000.00	~18	~\$73,888.00	~1	~\$73,888.00
4 <sup>th</sup> quarter	\$980,000.00	~19	~\$51,578.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$338,545.00
2008 Total Amount Spent on General Lobbying					\$7,450,000.00
% of total spending directed towards chemical security lobbying					~4.5%

**National Mining Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,133,599.00	~9	~\$125,955.00	~1	~\$125,955.00
2 <sup>nd</sup> quarter	\$1,434,898.00	~12	~\$119,574.00	~1	~\$119,574.00
3 <sup>rd</sup> quarter	\$1,042,960.00	~11	~\$94,814.00	0	~\$0
4 <sup>th</sup> quarter	\$952,828.00	~9	~\$105,869.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$245,529.00
2008 Total Amount Spent on General Lobbying					\$4,564,285.00
% of total spending directed towards chemical security lobbying					~5.4%

**National Petrochemical & Refiners Association (NPRA)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$131,646.00	~5	~\$26,331.00	~2	~\$52,662.00
2 <sup>nd</sup> quarter	\$210,323.00	~5	~\$42,064.00	~2	~\$84,128.00
3 <sup>rd</sup> quarter	\$201,287.00	~6	~\$33,547.00	~2	~\$67,094.00
4 <sup>th</sup> quarter	\$271,117.00	~5	~\$54,223.00	~2	~\$108,446.00
2008 Total Spent on Chem Lobbying					~\$312,330.00
2008 Total Amount Spent on General Lobbying					\$814,373.00
% of total spending directed towards chemical security lobbying					~38.3%

**National Propane Gas Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$200,000.00	~4	~\$50,000.00	~2	~\$100,000.00
2 <sup>nd</sup> quarter	\$181,421.13	~8	~\$22,677.00	~2	~\$45,354.00
3 <sup>rd</sup> quarter	\$223,806.00	~3	~\$74,602.00	~2	~\$149,204.00
4 <sup>th</sup> quarter	\$181,421.13	~3	~\$60,473.00	~2	~\$120,946.00
2008 Total Spent on Chem Lobbying					~\$415,504.00
2008 Total Amount Spent on General Lobbying					\$786,648.64
% of total spending directed towards chemical security lobbying					~52.8%

**Petroleum Marketers Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$168,000.00	~17	~\$9,882.00	~2	~\$19,764.00
2 <sup>nd</sup> quarter	\$168,000.00	~17	~\$9,882.00	~2	~\$19,764.00
3 <sup>rd</sup> quarter	\$168,000.00	~17	~\$9,882.00	~2	~\$19,764.00
4 <sup>th</sup> quarter	\$168,000.00	~17	~\$9,882.00	~2	~\$19,764.00
2008 Total Spent on Chem Lobbying					~\$79,056.00
2008 Total Amount Spent on General Lobbying					\$672,000.00
% of total spending directed towards chemical security lobbying					~11.7%



**Synthetic Organic Chemical Manufacturers Association (SOCMA)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$54,518.00	~3	~\$18,172.00	~1	~\$18,172.00
2 <sup>nd</sup> quarter	\$51,139.00	~5	~\$10,227.00	~1	~\$10,227.00
3 <sup>rd</sup> quarter	\$21,028.00	~2	~\$10,514.00	~1	~\$10,514.00
4 <sup>th</sup> quarter	\$61,501.00	~3	~\$20,500.00	~1	~\$20,500.00
2008 Total Spent on Chem Lobbying					~\$59,413.00
2008 Total Amount Spent on General Lobbying					\$188,186.00
% of total spending directed towards chemical security lobbying					~31.5%

**Conrad Law & Policy Council for SOCMA**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$10,000.00	~2	~\$5,000.00	~1	~\$5,000.00
2 <sup>nd</sup> quarter	<\$5,000.00 (amounts <\$5k not counted)	~1	N/A	~1	N/A
3 <sup>rd</sup> quarter	<\$5,000.00	~1	N/A	~1	N/A
4 <sup>th</sup> quarter	No data filed	N/A	N/A	N/A	N/A
2008 Total Spent on Chem Lobbying					~\$5,000.00
2008 Total Amount Spent on General Lobbying					\$10,000.00
% of total spending directed towards chemical security lobbying					~50.0%

**The Fertilizer Institute**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$212,356.00	~5	~\$42,471.00	~1	~\$42,471.00
2 <sup>nd</sup> quarter	\$329,793.00	~5	~\$69,958.00	~1	~\$69,958.00
3 <sup>rd</sup> quarter	\$249,805.83	~5	~\$49,961.00	~1	~\$49,961.00
4 <sup>th</sup> quarter	\$279,024.29	~4	~\$69,756.00	~1	~\$69,756.00
2008 Total Spent on Chem Lobbying					~\$232,146.00
2008 Total Amount Spent on General Lobbying					\$1,070,979.12
% of total spending directed towards chemical security lobbying					~21.6%

**U.S. Chamber of Commerce**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$9,820,000.00	~41	~\$239,512.00	~3	~\$718,536.00
2 <sup>nd</sup> quarter	\$7,890,000.00	~40	~\$197,250.00	~3	~\$591,750.00
3 <sup>rd</sup> quarter	\$20,600,000.00	~39	~\$528,205.00	~2	~\$1,056,410.00
4 <sup>th</sup> quarter	\$24,030,000.00	~40	~\$600,750.00	~3	~\$1,802,250.00
2008 Total Spent on Chem Lobbying					~\$4,168,946.00
2008 Total Amount Spent on General Lobbying					\$62,240,000.00
% of total spending directed towards chemical security lobbying					~6.7%



**2008 LOW RANGE LOBBYING EXPENDITURES ON CHEMICAL SECURITY**  
**Total Spent on Chem Security Lobbying: ~\$3,020,073.00 LOW RANGE VALUE**

**American Chemistry Council (ACC)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$770,000.00	~48	~\$16,041.00	~2	~\$32,028.00
2 <sup>nd</sup> quarter	\$1,440,000.00	~65	~\$22,153.00	~2	~\$44,306.00
3 <sup>rd</sup> quarter	\$940,000.00	~54	~\$17,407.00	~2	~\$34,814.00
4 <sup>th</sup> quarter	\$790,000.00	~46	~\$17,173.00	~2	~\$34,346.00
2008 Total Spent on Chem Lobbying					~\$145,494.00
2008 Total Amount Spent on General Lobbying					\$3,940,000.00
% of total spending directed towards chemical security lobbying					~ 3.7%

**Bob Moss for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	~\$30,000.000
2 <sup>nd</sup> quarter	\$30,000.000	~3	\$10,000.000	~1	~\$10,000.000
3 <sup>rd</sup> quarter	\$30,000.000	~1	\$30,000.000	~1	~\$30,000.000
4 <sup>th</sup> quarter	\$30,000.000	~3	\$10,000.000	~1	~\$10,000.000
2008 Total Spent on Chem Lobbying					~\$80,000.00
2008 Total Amount Spent on General Lobbying					\$120,000.00
% of total spending directed towards chemical security lobbying					~66.6%

**Holland & Knight LLC for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$80,000.00	~9	~\$8,888.00	~3	~\$26,664.00
2 <sup>nd</sup> quarter	\$130,000.00	~11	~\$11,818.00	~3	~\$35,454.00
3 <sup>rd</sup> quarter	\$100,000.00	~6	~\$16,666.00	~3	~\$49,998.00
4 <sup>th</sup> quarter	\$80,000.00	~11	~\$7,272.00	~3	~\$21,818.00
2008 Total Spent on Chem Lobbying					~\$133,934.00
2008 Total Amount Spent on General Lobbying					\$390,000.00
% of total spending directed towards chemical security lobbying					~34.3%

**Ogilvy Government Relations for the ACC**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$60,000.00	~9	~\$6,666.00	3	~\$19,998.00
2 <sup>nd</sup> quarter	\$60,000.00	~10	~\$6,000	3	~\$18,000.00
3 <sup>rd</sup> quarter	\$60,000.00	~13	~\$4,615.00	3	~\$13,845.00
4 <sup>th</sup> quarter	\$60,000.00	~11	~\$5,454.00	3	~\$16,362.00
2008 Total Spent on Chem Lobbying					~\$68,205.00
2008 Total Amount Spent on General Lobbying					\$240,000.00
% of total spending directed towards chemical security lobbying					~28.4%

**DOW Chemical Company**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$540,000.00	~95	~\$5,684.00	3	~\$17,052.00
2 <sup>nd</sup> quarter	\$790,000.00	~95	~\$8,315.00	0	\$0
3 <sup>rd</sup> quarter	\$1,980,000.00	~100	~\$19,800.00	0	\$0
4 <sup>th</sup> quarter	\$1,370,000.00	~93	~\$14,731.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$17,052.00
2008 Total Amount Spent on General Lobbying					\$4,680,000.00
% of total spending directed towards chemical security lobbying					~0.36%

**GolinHaris for DOW Chemical Company**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$160,000.00	~6	~\$26,666.00	3	~\$79,998.00
2 <sup>nd</sup> quarter	\$110,000.00	~8	~\$13,750.00	3	~\$41,250.00
3 <sup>rd</sup> quarter	\$110,000.00	~5	~\$22,000.00	0	~\$0
4 <sup>th</sup> quarter	\$110,000.00	~8	~\$13,750.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$121,248.00
2008 Total Amount Spent on General Lobbying					\$490,000.00
% of total spending directed towards chemical security lobbying					~24.7%

**E. I. du Pont de Nemours & Co.**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$810,000.00	~60	~\$13,500.00	3	~\$40,500.00
2 <sup>nd</sup> quarter	\$1,312,000.00	~57	~\$23,017.00	3	~\$69,051.00
3 <sup>rd</sup> quarter	\$1,059,886.00	~50	~\$21,197.00	3	~\$63,591.00
4 <sup>th</sup> quarter	\$1,059,886.00	~54	~\$19,627.00	3	~\$58,881.00
2008 Total Spent on Chem Lobbying					~\$232,023.00
2008 Total Amount Spent on General Lobbying					\$4,241,772.00
% of total spending directed towards chemical security lobbying					~5.5%

**Agricultural Retailers Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$50,000.00	~ 39	~\$1,282.00	2	~\$2,564.00
2 <sup>nd</sup> quarter	\$100,000.00	~ 45	~\$2,222.00	2	~\$4,444.00
3 <sup>rd</sup> quarter	\$100,000.00	~ 40	~\$2,500.00	2	~\$5,000.00
4 <sup>th</sup> quarter	\$100,000.00	~54	~\$1,851.00	2	~\$3,702.00
2008 Total Spent on Chem Lobbying					~\$15,710.00
2008 Total Amount Spent on General Lobbying					\$350,000.00
% of total spending directed towards chemical security lobbying					~4.5%

**American Exploration & Production Council**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.00	~22	~\$1,363.00	1	~\$1,363.00
2 <sup>nd</sup> quarter	\$30,000.00	~38	~\$789.00	1	~\$789.00
3 <sup>rd</sup> quarter	\$20,000.00	~10	~\$2,000	0	~\$0
4 <sup>th</sup> quarter	\$20,000.00	~3	~\$7,333.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$2,152.00
2008 Total Amount Spent on General Lobbying					\$100,000.00
% of total spending directed towards chemical security lobbying					~2.1%

**American Farm Bureau**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$690,000.00	~87	~\$7,931.00	~1	~\$7,931.00
2 <sup>nd</sup> quarter	\$750,000.00	~121	~\$6,198.00	~2	~\$12,396.00
3 <sup>rd</sup> quarter	\$640,000.00	~127	~\$5,039	~2	~\$10,078.00
4 <sup>th</sup> quarter	\$540,000.00	~115	~\$4,695.00	~1	~\$4,695.00
2008 Total Spent on Chem Lobbying					~\$35,100.00
2008 Total Amount Spent on General Lobbying					\$2,670,000.00
% of total spending directed towards chemical security lobbying					~1.3%

**American Forest & Paper Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,080,000.00	~47	~\$22,978.00	1	~\$22,978.00
2 <sup>nd</sup> quarter	\$820,000.00	~53	~\$15,471.00	2	~\$30,942.00
3 <sup>rd</sup> quarter	\$650,000.00	~68	~\$9,558.00	2	~\$19,116.00
4 <sup>th</sup> quarter	\$580,000.00	~51	~\$11,372.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$73,036.00
2008 Total Amount Spent on General Lobbying					\$3,130,000.00
% of total spending directed towards chemical security lobbying					~2.3%

**American Petroleum Institute (API)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,270,000.00	~118	~\$10,762.00	3	~\$32,286.00
2 <sup>nd</sup> quarter	\$1,020,000.00	~133	~\$7,669.00	3	~\$23,007.00
3 <sup>rd</sup> quarter	\$1,300,000.00	~190	~\$6,842.00	2	~\$13,684.00
4 <sup>th</sup> quarter	\$1,259,437.00	~186	~\$6,771.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$68,997.00
2008 Total Amount Spent on General Lobbying					\$4,849,437.00
% of total spending directed towards chemical security lobbying					~1.4%

**American Trucking Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$418,220.00	~118	~\$3,544.00	~2	~\$7,088.00
2 <sup>nd</sup> quarter	\$541,730.00	~118	~\$4,590.00	~2	~\$9,180.00
3 <sup>rd</sup> quarter	\$441,730.00	~117	~\$3,775.00	~2	~\$7,550.00
4 <sup>th</sup> quarter	\$473,593.00	~117	~\$4,047.00	~2	~\$8,094.00
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$31,912.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$1,874,729.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~1.7%</b>

**Consumer Specialty Products Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$16,000.00	~2	~\$8,000.00	~1	~\$8,000.00
2 <sup>nd</sup> quarter	\$20,062.51	~2	~\$10,031.25	0	~\$0
3 <sup>rd</sup> quarter	\$10,118.00	~2	~\$5,059.00	0	~\$0
4 <sup>th</sup> quarter	<\$5,000.00 (amounts <\$5k not counted)	~2	N/A	N/A	N/A
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$8,000.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$46,180.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~17.3%</b>

**Croplife America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$492,195.00	~20	~\$24,609.00	2	~\$49,218.00
2 <sup>nd</sup> quarter	\$464,247.00	~17	~\$27,308.00	2	~\$54,616.00
3 <sup>rd</sup> quarter	\$483,715.00	~10	~\$48,371.00	2	~\$96,712.00
4 <sup>th</sup> quarter	\$658,367.00	~12	~\$54,863.00	2	~\$109,746.00
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$310,292.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$2,098,524.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~14.8%</b>

**The Alpine Group for Croplife America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$30,000.00	~3	~\$10,000.00	~0	~\$0
2 <sup>nd</sup> quarter	\$30,000.00	~7	~\$4,285.00	~2	~\$8,570.00
3 <sup>rd</sup> quarter	\$30,000.00	~7	~\$4,285.00	~2	~\$8,570.00
4 <sup>th</sup> quarter	\$30,000.00	~4	~\$7,500.00	~1	~\$7,500.00
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$24,640.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$120,000.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~20.5%</b>

**Edison Electric Institute**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$2,200,000.00	~50	~\$44,000.00	~2	~\$88,000.00
2 <sup>nd</sup> quarter	\$1,973,371.00	~66	~\$29,899.00	~2	~\$59,798.00
3 <sup>rd</sup> quarter	\$1,670,000.00	~57	~\$29,298.00	~2	~\$58,596.00
4 <sup>th</sup> quarter	\$1,630,000.00	~54	~\$30,185.00	~2	~\$60,370.00
2008 Total Spent on Chem Lobbying					~\$266,764.00
2008 Total Amount Spent on General Lobbying					\$7,473,371.00
% of total spending directed towards chemical security lobbying					~3.5%

**Environmental Technology Council**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
2 <sup>nd</sup> quarter	\$20,000.00	~3	~\$6,666.00	~1	~\$6,666.00
3 <sup>rd</sup> quarter	\$25,000.00	~3	~\$8,333.00	~1	~\$8,333.00
4 <sup>th</sup> quarter	\$10,000.00	~1	~\$10,000.00	~0	~\$0
2008 Total Spent on Chem Lobbying					~\$21,665.00
2008 Total Amount Spent on General Lobbying					\$75,000.00
% of total spending directed towards chemical security lobbying					~28.8%

**Institute Makers of Explosives**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~8	~\$2,500.00	~2	~\$5,000.00
2 <sup>nd</sup> quarter	\$20,000.00	~7	~\$2,857.00	~2	~\$5,714.00
3 <sup>rd</sup> quarter	\$20,000.00	~3	~\$6,666.00	0	~\$0
4 <sup>th</sup> quarter	\$20,000.00	~8	~\$2,500.00	~1	~\$2,500.00
2008 Total Spent on Chem Lobbying					~\$13,214.00
2008 Total Amount Spent on General Lobbying					\$80,000.00
% of total spending directed towards chemical security lobbying					~16.5%

**International Dairy Foods Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$167,000.00	~7	~\$23,857.00	~1	~\$23,857.00
2 <sup>nd</sup> quarter	\$180,000.00	~8	~\$22,500.00	~0	~\$0
3 <sup>rd</sup> quarter	\$110,000.00	~8	~\$13,750.00	~0	~\$0
4 <sup>th</sup> quarter	\$186,491.00	~8	~\$23,311.00	~0	~\$0
2008 Total Spent on Chem Lobbying					~\$23,857.00
2008 Total Amount Spent on General Lobbying					\$643,491.00
% of total spending directed towards chemical security lobbying					~3.7%

**Interstate Natural Gas Association of America**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$300,000.00	~8	~\$37,500.00	~1	~\$37,500.00
2 <sup>nd</sup> quarter	\$180,000.00	~8	~\$22,500.00	~1	~\$22,500.00
3 <sup>rd</sup> quarter	\$151,881.00	~10	~\$15,188.00	N/A	N/A
4 <sup>th</sup> quarter	\$160,000.00	~6	~\$26,666.00	N/A	N/A
2008 Total Spent on Chem Lobbying					~\$60,000.00
2008 Total Amount Spent on General Lobbying					\$791,881.00
% of total spending directed towards chemical security lobbying					~7.5%

**National Association of Chemical Distributors**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$20,000.00	~16	~\$1,250.00	~2	~\$2,500.00
2 <sup>nd</sup> quarter	\$20,000.00	~19	~\$1,052.00	~2	~\$2,104.00
3 <sup>rd</sup> quarter	\$10,000.00	~15	~\$666.00	~2	~\$1,332.00
4 <sup>th</sup> quarter	\$20,000.00	~18	~\$1,111.00	~2	~\$2,222.00
2008 Total Spent on Chem Lobbying					~\$8,158.00
2008 Total Amount Spent on General Lobbying					\$70,000.00
% of total spending directed towards chemical security lobbying					~11.6%

**National Association of Manufacturers (NAM)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$2,230,000.00	~208	~\$10,721.00	~1	~\$10,721.00
2 <sup>nd</sup> quarter	\$2,910,000.00	~248	~\$11,733.00	~1	~\$11,733.00
3 <sup>rd</sup> quarter	\$1,330,000.00	~256	~\$5,195.00	~1	~\$5,195.00
4 <sup>th</sup> quarter	\$980,000.00	~218	~\$4,495.00	0	\$0
2008 Total Spent on Chem Lobbying					~\$27,649.00
2008 Total Amount Spent on General Lobbying					\$7,450,000.00
% of total spending directed towards chemical security lobbying					~0.37%

**National Mining Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$1,133,599.00	~31	~\$36,567.00	~2	~\$73,134.00
2 <sup>nd</sup> quarter	\$1,434,898.00	~50	~\$28,697.00	~2	~\$57,394.00
3 <sup>rd</sup> quarter	\$1,042,960.00	~46	~\$22,673.00	0	~\$0
4 <sup>th</sup> quarter	\$952,828.00	~47	~\$20,272.00	0	~\$0
2008 Total Spent on Chem Lobbying					~\$130,528.00
2008 Total Amount Spent on General Lobbying					\$4,564,285.00
% of total spending directed towards chemical security lobbying					~2.85%



**National Petrochemical & Refiners Association (NPRA)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$131,646.00	~12	~\$10,970.00	2	~\$21,940.00
2 <sup>nd</sup> quarter	\$210,323.00	~15	~\$14,021.00	2	~\$28,042.00
3 <sup>rd</sup> quarter	\$201,287.00	~21	~\$9,585.00	2	~\$19,170.00
4 <sup>th</sup> quarter	\$271,117.00	~21	~\$12,910.00	2	~\$25,820.00
2008 Total Spent on Chem Lobbying					~\$94,972.00
2008 Total Amount Spent on General Lobbying					\$814,373.00
% of total spending directed towards chemical security lobbying					~11.7%

**National Propane Gas Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$200,000.00	~10	~\$20,000.00	~2	~\$40,000.00
2 <sup>nd</sup> quarter	\$181,421.13	~21	~\$8,639.00	~2	~\$17,278.00
3 <sup>rd</sup> quarter	\$223,806.00	~14	~\$15,986.00	~2	~\$31,972.00
4 <sup>th</sup> quarter	\$181,421.13	~11	~\$16,492.00	~2	~\$32,984.00
2008 Total Spent on Chem Lobbying					~\$122,234.00
2008 Total Amount Spent on General Lobbying					\$786,648.64
% of total spending directed towards chemical security lobbying					~15.9%

**Petroleum Marketers Association**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$168,000.00	~44	~\$3,818.00	~2	~\$7,636.00
2 <sup>nd</sup> quarter	\$168,000.00	~55	~\$3,054.00	~2	~\$6,108.00
3 <sup>rd</sup> quarter	\$168,000.00	~47	~\$3,574.00	~2	~\$7,148.00
4 <sup>th</sup> quarter	\$168,000.00	~55	~\$3,054.00	~2	~\$6,108.00
2008 Total Spent on Chem Lobbying					~\$27,000.00
2008 Total Amount Spent on General Lobbying					\$672,000.00
% of total spending directed towards chemical security lobbying					~4.0%

**Synthetic Organic Chemical Manufacturers Association (SOCMA)**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$54,518.00	~6	~\$9,086.00	~1	~\$9,086.00
2 <sup>nd</sup> quarter	\$51,139.00	~9	~\$5,682.00	~2	~\$11,364.00
3 <sup>rd</sup> quarter	\$21,028.00	~2	~\$10,514.00	~1	~\$10,514.00
4 <sup>th</sup> quarter	\$61,501.00	~3	~\$20,501.00	~1	~\$20,500.00
2008 Total Spent on Chem Lobbying					~\$51,464.00
2008 Total Amount Spent on General Lobbying					\$188,186.00
% of total spending directed towards chemical security lobbying					~27.3%

**Conrad Law & Policy Council for SOCMA**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$10,000.00	~3	~\$3,333.00	~2	~\$6,666.00
2 <sup>nd</sup> quarter	<\$5,000.00 (amounts <\$5k not counted)	~2	N/A	~2	N/A
3 <sup>rd</sup> quarter	<\$5,000.00	~1	N/A	~1	N/A
4 <sup>th</sup> quarter	No data filed	N/A	N/A	N/A	N/A
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$6,666.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$10,000.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~66.6%</b>

**The Fertilizer Institute**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$212,356.00	~12	~\$17,696.00	~2	~\$35,392.00
2 <sup>nd</sup> quarter	\$329,793.00	~12	~\$27,482.00	~2	~\$54,964.00
3 <sup>rd</sup> quarter	\$249,805.83	~16	~\$15,612.00	~2	~\$31,224.00
4 <sup>th</sup> quarter	\$279,024.29	~4	~\$69,756.00	~1	~\$69,756.00
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$226,728.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$1,070,979.12</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~21.1%</b>

**U.S. Chamber of Commerce**

	Amount Spent on Lobbying Congress and Senate	Total # of issues	Amount Spent/ per Issue	Total # of chem security issues	Amount Spent on chem security issues
1 <sup>st</sup> quarter	\$9,820,000.00	~449	~\$21,870.00	~4	~\$87,480.00
2 <sup>nd</sup> quarter	\$7,890,000.00	~510	~\$15,470.00	~5	~\$77,350.00
3 <sup>rd</sup> quarter	\$20,600,000.00	~399	~\$51,629.00	~4	~\$206,516.00
4 <sup>th</sup> quarter	\$24,030,000.00	~517	~\$46,479.00	~5	~\$232,395.00
<b>2008 Total Spent on Chem Lobbying</b>					<b>~\$603,741.00</b>
<b>2008 Total Amount Spent on General Lobbying</b>					<b>\$62,240,000.00</b>
<b>% of total spending directed towards chemical security lobbying</b>					<b>~.97%</b>