

Exhibit 28

MAURICE & LILIANE GREEN
APT. 318 - THE KENWOOD
5101 RIVER ROAD
BETHESDA, MARYLAND 20016

(301) 856-8596

June 3, 1980

Dr. J.T. Braunnholtz
ICI/Plant Protection Division
Farnhurst
Haslemere
Surrey GU27 3JE
England

Dear John:

I hope that you are well and that PPD is flourishing. I have been in touch with Dick Herrett, and he and Joan are coming to visit us. Lily and I are very happy, we have a pleasant apartment and a good social life.

I greatly enjoyed my term as visiting professor at the University of Florida. The advantage of having a class for a whole term is that you can get to know them all as individuals and establish a rapport with them. I had a multinational class including Phillipino, Taiwanese, Mexican, Puerto Rican, Costa Rican, Venezuelan, Indian as well as American. It took some time to break down their reserve but eventually we established good discussion sessions. These were very interesting as the views of the people from lesser-developed countries often differed markedly from those of Americans. Lack of mastery of written English was a problem and the syntax and grammar of some of the examination papers were, to say the least of it, bizarre. The American University system is rather like the caucus race in Alice in Wonderland -- everybody gets a prize and nobody fails. As one professor put it to me "American Universities are dedicated to glorification and perpetuation of the mediocre". Any professor who turns in a lot of low grades is advised by the authorities to go through the papers again and apply what is euphemistically called "grade inflation". Although I enjoyed it I should not wish to teach permanently.

I greatly enjoy my new job in Washington. My company exists to help any firms which have problems with the government authorities such as EPA, FDA, OSHA etc. over registration of products, occupational safety and health, toxic substances, hazards to consumers, disposal of wastes and effluents, etc. We independently assess the size of the problem and make recommendations

on what should be done about it, and we also handle all the negotiations with the government departments for our clients as we know all the protocol and the right form in which to present evidence and we also have an inside track to EPA. EPA also use us to assess the risks of products, effluents etc. from firms they suspect because they have neither the money nor the staff to do all the work themselves. What Clement Associates is is a new breed of "toxic substances attorneys" who combine extensive legal knowledge with top quality science. The principle of absolute product liability for chemicals is now endorsed by U.S. law. This is retroactive. Firms who disposed of wastes twenty years ago in ways which were given full approval by Government departments at the time can now be sued by the Government if later knowledge proves the wastes to be a health hazard. They can similarly be sued for damage caused by products which were given full safety approval and registration by the Government at some earlier date. Firms are looking more and more to insurance against risks of prosecution since the penalties can be serious. When I got here I found that the President of Clement Associates, John Kolojeski, had been thinking along the same lines as me, as exemplified in the enclosed article. We are proposing to act on behalf of insurance companies essentially as actuaries. When any firm asks for insurance we shall go in and assess the risk and advise the insurance company who will then set their premiums accordingly. If we make recommendations on how the risk could be reduced, the insurance company will lower premiums if the firm adopt our recommendations. We have already talked to some insurance companies who are very keen on the idea. This could be big business for us in which I should be heavily involved.

Another field I am getting myself into is re-registration of new pesticides. EPA decided to look at all existing pesticide registrations and reconsider the evidence submitted in support of registration in the light of present-day knowledge and of any toxicological data which had been obtained for the compound since registration, and to decide whether to re-register the product, to give a conditional registration and call for more experimental evidence within a set time, or to publish a rebuttable presumption against re-registration of compound. They initially set out to examine all the labels they had approved for various formulations, but this was obviously too large a job. They therefore settled for reconsideration of the active ingredients only and issue of generalised registrations for these. However, this also proved beyond the scope of the present staff, so they handed the whole job over to Clement Associates. We have a \$5 Million contract to develop the risk assessments for 78 existing pesticides. Strangely enough, the first one that EPA sent us was Paraquat. I suggested that a logical way to deal with re-registration was not to consider existing pesticides randomly in isolation but to

consider all the pesticides which are used in a particular crop -- cotton, soya, corn, wheat etc. and to carry out risk/benefit assessments on each of these. The crop protection and pest control methods available for a particular crop, could then be ranked. This would assist decision on whether withdrawal of a particular pesticide would harm the nation's agriculture. I realize that the nature and severity of pest problems in a crop vary considerably from one environment to another, but I think it will be sufficient to select a number of environments for each crop and do the risk/benefit analysis at representative sites in each of these. For example, for cotton, I should do at least one site in each of (a) the irrigated deserts of the Far West (b) the Highlands of Texas and Oklahoma (c) the semi-arid SW (d) the humid S and SE. We already have the toxicological expertise in Clement to deal with the risk assessment and I shall build up the facilities here to do the benefit assessment and the risk/benefit analysis.

Best wishes

Maurice