



PEER
PUBLIC EMPLOYEES
FOR ENVIRONMENTAL
RESPONSIBILITY

2024

OCTOBER 2023 THROUGH SEPTEMBER 2024

ANNUAL REPORT



FIGHTING FOR WHAT IS RIGHT

Dear Friends,

As I write this on the day after the election of Donald Trump as the next president of the United States, there's no doubt that environmental and political events have been devastating for many of us.

The political events unfolding around us are shocking and threaten our democracy, economy, and the health of our country. Meanwhile, evidence continues to grow that we are approaching dangerous planetary boundaries on climate change, biodiversity loss, and toxic pollution.

Unfortunately, many of our nation's worst impulses have overshadowed our highest ideals in these crucial times. We have witnessed dangerous levels of political threats designed to undermine the rule of law and destroy important cultural norms that allow people to work together to solve common problems.

As we face these challenging times together, I am reminded of the great sacrifices public employees make for our country and the critical links between our work, democracy, and good governance.

In this Annual Report, you will see the story of an extraordinary group of dedicated individuals who have worked on some of the toughest environmental and governance challenges facing our nation. Their work is an inspiration to all of us concerned about our country's future.

While we cannot talk about everything we do, PEER's work has saved the careers of countless public servants, often by talking them out of publicly blowing the whistle and convincing them to work through PEER to expose and address serious problems.

We have also robustly used Freedom of Information Act litigation as part of a transparency program guided by insider sources. Through these and other methods, we help public servants exercise their Free Speech rights to communicate concerns to their true employers – you, the public.

Finally, we have used the courts to ensure that government agencies are implementing laws designed to protect public health and the environment.

We are particularly proud of our work in the past year protecting western lands, fighting to keep dangerous per- and polyfluoroalkyl substance (PFAS) chemicals out of fertilizers, pesticides, and plastics, and strengthening scientific integrity programs in the federal government.

So, where do we go from here given the result of the presidential election?

We step up our work with a renewed sense of purpose and vigor. PEER is the *only* organization working on behalf of public employees who protect our environment. For over 30 years, PEER has protected conscientious public servants while combatting politicized attacks on our environment.

With your help, PEER will rise to meet this challenge again.

Sincerely,

A handwritten signature in blue ink that reads "Timothy Whitehouse". The signature is fluid and cursive, with a long, sweeping underline.

Timothy Whitehouse,
Executive Director



PEER MISSION STATEMENT

PEER defends public employees who protect our environment, natural resources, and public health. We work with environmental and public health professionals, land managers, scientists, enforcement officers and other current and former civil servants dedicated to upholding environmental laws and values.

To help stabilize our climate, PEER's Climate Integrity Program works to hold government accountable to ambitious climate goals based on sound science and policy. We recognize that a strong civil service and dedicated public employees are essential to addressing climate change.

PEER's success comes from the dedication of its staff and board and the countless civil servants who work with us to protect the environment.

STAFF

Tim Whitehouse, Executive Director
Paula Dinerstein, General Counsel
Peter Jenkins, Senior Counsel
Colleen Teubner, Litigation and Policy Attorney
Laura Dumais, Staff Counsel
Kyla Bennett, Director of Science Policy and Northeast and Mid-Atlantic PEER
Chandra Rosenthal, Director, Rocky Mountain PEER
Jeff Ruch, Director, Pacific PEER
Helen Jenkins, Director of Development and Communications
Claire Turner, Development Manager
Mer Mietzelfeld, Institutional Giving Manager
Michelle Shaffer, Digital Media Associate
Nicole Bracey, Human Resources & Office Manager
Laurie Williams, Climate Consultant
Barry Sulkin, Technical Consultant

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PEER
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HOW DO WE ACHIEVE OUR GOALS?

1 PROTECT public employees. We use all legal and administrative means and apply public and political pressure to support employees who suffer retaliation or other negative consequences because of their work protecting the environment.

2 INCREASE government transparency. Maintaining government transparency is essential for environmental protection and to ensure that government serves the public good. PEER works with current and former government employees, usually anonymously, to address issues through official channels and bring hidden information into the light of day.

3 IMPROVE laws and regulations. PEER engages in litigation and advocacy to ensure the enforcement and implementation of environmental laws, the use of sound science in decision-making, and adherence to the rule of law. We work to provide solutions to environmental problems both nationally and locally.

4 EXPAND collaboration with other groups. Building lasting change requires coalitions working toward common goals. PEER partners with groups on projects and litigation and provides counsel to nonprofits within our areas of expertise.

5 ELEVATE lesser heard voices. Finding solutions to environmental problems requires the involvement of disadvantaged and disempowered communities. PEER works with current and former government employees to elevate the voices of individuals, communities, and local coalitions often left unheard.



"As a staff counsel at PEER, I am proud to be part of a team that works with concerned government employees to strengthen environmental and public health protections, increase government transparency, and protect whistleblowers. I'm constantly amazed at how much we're able to accomplish; our unique mission and dedicated supporters make us an exceedingly productive organization."

Laura Dumais, Staff Counsel



"I have been honored to be on PEER's Board of Directors now for over three years, and to chair the development committee for two years. I am in awe of PEER's tenacity and determination in fighting for their clients and the scientific expertise they bring to their work. They are an effective and inspirational organization!"

Darrell Carrington, Chair Development Committee

PEER is a trusted source of expertise for the media on important local and national issues. We had 1,450 press mentions this past year. Here are a few highlights:

PROPUBLICA

EPA Scientists Said They Were Pressured to Downplay Harms From Chemicals. A Watchdog Found They Were Retaliated Against.

"These whistleblowers have been beaten down, ostracized and punished, when all they were trying to do was to protect us," said **Kyla Bennett**, director of science policy at Public Employees for Environmental Responsibility, an organization that helped the scientists draft the complaints to the EPA inspector general.

Fort Worth Star-Telegram

'A nightmare.' North Texas farmers say chemicals in fertilizer are killing their livestock

Laura Dumais, an attorney with Public Employees for Environmental Responsibility, the non-profit organization representing the farmers and Johnson County their lawsuit against the EPA, explains that the EPA has sought a delay in the case.

Government Executive

PEER sues to force OPM to implement administrative leave reforms

"The Office of Personnel Management is not living up to its title," said PEER Senior Counsel **Peter Jenkins** in a statement. "The basis of this suit is unreasonable delay, and seven years of inaction is unreasonable in any book. At PEER, we often see whistleblowers or employees who deliver inconvenient truths placed into limbo in hopes that they will simply resign."

HONOLULU CIVIL BEAT

Helicopter Companies Push To Reopen New Plan Restricting Air Tours Over Volcanoes Park

Colleen Teubner, policy and litigation attorney for Public Employees for Environmental Responsibility, discusses PEER's success in limiting the environmental and cultural damage caused by excessive air tours over National Parks and how that might impact a new lawsuit in Hawaii.

The Washington Post

Why scientists fear a second Trump term, and what they are doing about it

When the union representing nearly half of Environmental Protection Agency employees approved a new contract with the federal government, it included protections from political meddling into their work. While helpful, the provision won't be a panacea, said **Tim Whitehouse**, the executive director of Public Employees for Environmental Responsibility, a nonprofit advocacy group, which helped advise the union, AFGE, on the scientific integrity language.

HighCountryNews

Federal grazing lands fail their checkup

"There are millions and millions of acres that are not meeting the BLM's own health standards," said **Chandra Rosenthal**, the director of PEER's Rocky Mountain office. "That is the big takeaway here."

The Minnesota Star Tribune

Federal officials revise grant conditions to ensure DNR logging on hunting lands serves wildlife

To further scrutinize logging practices at the Department of Natural Resources, federal wildlife officials have sharpened the requirements Minnesota must meet before receiving critical funding meant to protect and build wildlife habitat on public hunting lands. "It shows how Fish and Wildlife has put a tight leash on the state," said **Chandra Rosenthal**, a regional director of Public Employees for Environmental Responsibility.

Check out all of our other media stories and mentions here:
<https://peer.org/the-newsroom/news-clips/>





Protecting Our Food Supply from Toxic Fertilizer

PEER is suing the U.S. Environmental Protection Agency (EPA) on behalf of farmers and ranchers in Texas after their livelihoods were ruined when per- and polyfluoroalkyl substances (PFAS) from biosolids used as fertilizers on neighboring properties leached onto their land and contaminated their animals, soil, and water.

Every year, millions of tons of biosolids are applied to land as fertilizer on farms. Biosolids are made from both municipal and industrial waste. Although treated to remove pathogens, these biosolids (also called “sewage sludge”) often contains dangerous levels of PFAS, a family of toxic chemicals known as “forever chemicals.”

When biosolids containing PFAS are land-applied, these dangerous chemicals leach into soil and groundwater, and are then taken up by plants, which are then consumed by humans, livestock, and wildlife.

Under the Clean Water Act, EPA is supposed to ensure the safety of biosolid fertilizers, yet for over two decades, the agency has failed to take the necessary steps to protect our agricultural lands. This is a huge failure on EPA’s part.

Since PEER launched this lawsuit, Johnson County, Texas, the Maine Organic Farmers and Gardeners Association, and the Potomac Riverkeepers Network have joined our lawsuit. Throughout the country, farmers and communities will be dealing with this toxic legacy for generations because EPA is failing to act quickly to address this growing crisis.

Healthy soils and water are essential to the well-being of America’s farmers and the food we eat. That is why we will not rest until EPA agrees to set strict standards that keep toxic PFAS out of biosolids.



Please watch this video of ranchers James Farmer and Robin Alessi sharing their story of how PFAS contamination destroyed their property and livelihood. It is amazing that EPA has let this happen, they say. PEER staff counsel Laura Dumais also talks about why PEER is suing the EPA.



SCAN TO VIEW

Getting PFAS out of Pesticides

For years, PEER has contended that PFAS are prevalent in pesticides, despite assurances from EPA officials that EPA-approved pesticides do not contain PFAS.

In a new development, a peer-reviewed study by researchers from the Center for Biological Diversity, Environmental Working Group, and PEER have documented the widespread use of PFAS in pesticides.

Pushing EPA to ban the distribution of all pesticides containing PFAS is a top priority for us.

PEER has a long track record of representing whistleblowers and government employees who want to hold their agencies accountable for protecting public health and the environment from toxic chemicals and pollution.

One area of great concern is the U.S. Environmental Protection Agency (EPA)'s failure to properly assess and regulate toxic chemicals. This failure is causing significant long-term threats to a livable planet.

Bringing Science to New Chemical Review

In September 2024, EPA's Inspector General (IG) confirmed that EPA has retaliated against three scientists represented by PEER for objecting when managers deleted or altered the health risks of new chemicals that they were evaluating for safety. The risk assessments altered over the objections of these scientists addressed hazards such as major birth defects, heightened fetal toxicity, and carcinogenicity.

The IG will release additional reports on the whistleblowers' disclosures in the coming months. Last year, the IG issued a report that found, "EPA does not have reasonable assurance that the new chemicals review process is properly considering and addressing risks to public health and the environment."

Too often, we have found that EPA managers seem to think their job is to get as many new chemicals on the market as fast as possible. Our job is to do everything we can to make sure EPA protects humans and wildlife from dangerous exposures to toxic chemicals.

Protecting Communities from Toxic Chemicals

In 2019, PEER petitioned EPA to establish standards for the handling and disposal of waste contaminated with per- and polyfluoroalkyl substances (PFAS), a family of toxic chemicals known as "forever chemicals." This year, in response to our petition, EPA published rules that would

require the cleanup of some PFAS in waste under a limited number of circumstances.

EPA's proposal does not go far enough. In the coming years, PEER will continue to pressure EPA to develop a cradle-to-grave management plan for PFAS contaminated waste. Toxic PFAS contamination from waste is a preventable problem that EPA must address.

Fighting for Your Right to Know

EPA regularly keeps important health studies and data from the public. This is not just illegal; it puts workers and communities across the country at risk. When it comes to toxic chemicals, secrecy is the norm at EPA.

That is why this year we sued EPA to make public important health studies and data on the presence of PFAS in plastic containers. This lawsuit is part of PEER's effort to end EPA's chemical secrecy problem and ensure the public's right to know.



"A significant part of my work at PEER has been working with current and former public employees in an attempt to reform EPA's chemicals program. These brave

individuals know that exposure to toxic chemicals can harm children, shorten life expectancy, and negatively affect the well-being of all living things for generations.

We have made some progress in reforming EPA, but there is so much more to do."

Kyla Bennett, Director of Science Policy and Northeast and Mid-Atlantic PEER

PEER is a leader in the fight against trash incineration because of the toxic pollution it causes. We are making progress in Maryland as the state Senate President announced he would sponsor a bill to remove clean energy subsidies for trash incineration.



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When public employees face pressure to alter their work to support a politically convenient outcome, they often call PEER for guidance on how to navigate their situation. We work to defend these employees, and to keep government science strong, independent, and transparent so that it can support effective decision-making.

Strengthening Scientific Integrity

In the past year, PEER has been at the forefront of efforts to strengthen scientific integrity policies. As one of the few groups who represent workers filing scientific integrity complaints, we have found these policies generally to be ineffective at protecting scientists and resolving their underlying complaints.

Upon taking office, the Biden administration set in motion a process to strengthen scientific integrity policies in federal agencies after the anti-science agenda of the first Trump administration. While some of PEER's comments on improving these policies were accepted, the administration's efforts have resulted in updated policies that remain weak and largely unchanged.

On a positive note, with PEER's assistance, the U.S. Environmental Protection Agency's largest employee union won a provision protecting scientific integrity in its new collective bargaining agreement, opening the door to the use of federal labor law as a new tool to combat meddling by managers with science. This provides a model for other unions to follow.

In addition, PEER continued assisting employees who had filed complaints with Inspectors General about scientific integrity concerns and we worked with employees to file Data Quality Act complaints, which require that government materials are objective, of high quality, and useful.

Stopping Loyalty Oaths

One of President Trump's last acts was to sign an executive order creating a new Schedule F within the civil service, which gives political appointees the ability to easily hire and fire civil servants in policy-determining, policymaking, and policy-advocating positions.

This spring, the Biden administration issued a final rule

to make it more difficult for civil servants to be stripped of their workplace protections if a new administration attempts to revive Schedule F. PEER was strongly supportive of this effort.

Schedule F would allow the president and other political appointees to strip protections from civil servants perceived as disloyal to the president and encourage expressions of allegiance to the president when hiring, something PEER will always vigorously oppose.

Ending Excessive Leave

PEER is now in court to remove one tool an ill-motivated president could use to weaken the civil service – involuntary investigatory and administrative leave. Back in 2016, Congress outlawed involuntary paid leaves that “exceeded reasonable use,” citing cases, some that involved PEER clients, where employees were ordered to stay home for months or years. However, the Office of Personnel Management (OPM) failed to meet the 2017 deadline for finalizing implementing regulations as required by law.

In July, PEER sued after OPM failed to commit to a timeline to complete the regulations.

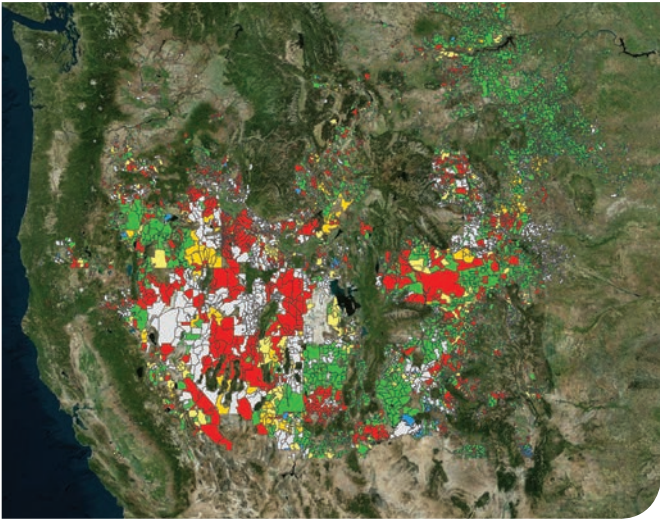
PEER has seen whistleblowers and other civil servants who deliver inconvenient truths cast into professional limbo in hopes that they will resign. That is why it is so important that OPM follow the law and implement regulations to prevent unreasonable administrative and investigatory leave.



“At PEER, we work hard to protect the rights of employees through litigation and administrative processes. During my time at PEER, I have represented

whistleblowers and worked to enhance civil service protections. PEER is a national leader in these critically important areas of work.”

Peter Jenkins, Senior Counsel, PEER



Approximately half of all BLM acres assessed are in failing health (in red). Healthy lands are vital for wildlife and build climate resiliency.

Protecting Healthy Rangelands and Wildlife

Wildlife of all sorts are in decline in the West.

Steep declines in the populations of Greater Sage-Grouse and mule deer are just two examples. The main reason for this decline is the poor conditions of the region's rangelands.

Improving rangeland health is an important part of PEER's work. As part of this work, we gather data from the Bureau of Land Management (BLM) to map the ecological health of America's rangelands. BLM manages over 245 million acres of land or one-tenth of the country's land base. Most of this land is in the West.

How BLM manages this land has significant consequences for fish, wildlife, and plant habitats.

Our research has found that vast areas do not meet BLM's own land health standards for minimum quality of water, vegetation, and soil and the ability to support wildlife. The most significant cause is systematic overuse by commercial livestock grazing.

PEER and allied groups are now suing BLM to stem overgrazing across vast stretches of fragile rangelands in the American West. Among other relief, the suit seeks a court order establishing a schedule for completion of long overdue health assessments on over 30 million acres of grazing allotments, as required by law.

We must push the federal government to improve their management of public lands. Federal agencies can help save our wildlife by following the laws already on the books.



Fighting for Real Climate Solutions

"While working at EPA as an attorney-advisor, I wrote and spoke extensively in my private capacity about climate

policies. As I learned about the many effective tools to fight climate change, I became concerned about our country's growing reliance on carbon offsets as a climate tool. The evidence is overwhelming that carbon offsets don't work to reduce greenhouse gas emissions and distract us all from the real work of cutting emissions.

I invite you to follow PEER's work to learn more about real climate solutions, such as protecting intact ecosystems and transitioning away from fossil fuels, and why relying on false solutions, like carbon offsets, is so dangerous. Our time to address the climate crisis is too short for us to rely on false solutions to the climate crisis."

Laurie Williams, PEER Climate Consultant

In June, PEER and allied groups filed a legal petition asking the Department of the Interior for a new analysis of the climate damage and other harms related to the Trans-Alaska Pipeline System and to phase down the pipeline's operations.

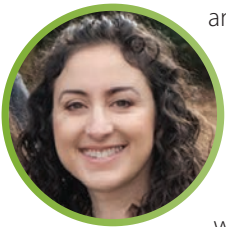


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PEER is financially supported by a dedicated group of donors. Each one has their own story of how they came to learn about and invest in PEER. We asked a handful of our 1st time donors in 2024 to share their reason for joining the PEER community.

Diana Colangelo

As a first-time donor to PEER, I appreciate its agility compared to larger environmental nonprofits. PEER takes on impactful cases that don't always align with the agendas of big organizations, and I value its straightforward approach to environmental issues. They're honest about who's responsible and what's needed to protect our environment. I'm especially concerned about habitat destruction, wildlife decline, and protecting public lands and parks, all areas where PEER is actively making a difference. I also admire how PEER holds agencies accountable and advocates for stronger environmental regulations. Being a smaller organization, I feel that my contribution to PEER is truly meaningful, rather than disappearing into the budget of a larger nonprofit. I encourage others to support PEER, as they play a unique role in addressing critical environmental issues that might otherwise go unaddressed.



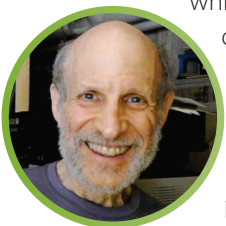
Mary O'Brien

I made my first gift to PEER because, honestly, "it's about damn time!" I'm inspired by the support PEER offers to federal employees facing unfair treatment; if I were in their shoes, I'd want PEER on my side. That's why I believe others should give to PEER too—everyone deserves an advocate when the system isn't working in their favor. PEER consistently puts in the hard work, and with the shifting political landscape, their role in protecting public employees and upholding environmental standards will only become more essential.



Paul Surovell

I made my first gift to PEER because of their invaluable research, which helped our local effort to stop the installation of artificial turf in Maplewood, NJ. Supporting a scientific organization dedicated to protecting children from toxic chemicals and health risks just felt like the best way to spend my money. I'm particularly inspired by PEER's work on PFAS in artificial turf and its dangerous impact on human health, water, and the environment. Today, while we enjoy the benefits of science and technology, we're also



facing widespread exposure to harmful chemicals. To tackle these tragic side effects of progress, we need independent, trustworthy voices with scientific expertise to identify issues and recommend solutions. PEER is exactly that, so if you care about our future, supporting them is an easy decision.

Thank You to our Foundation Partners for their Continued Support

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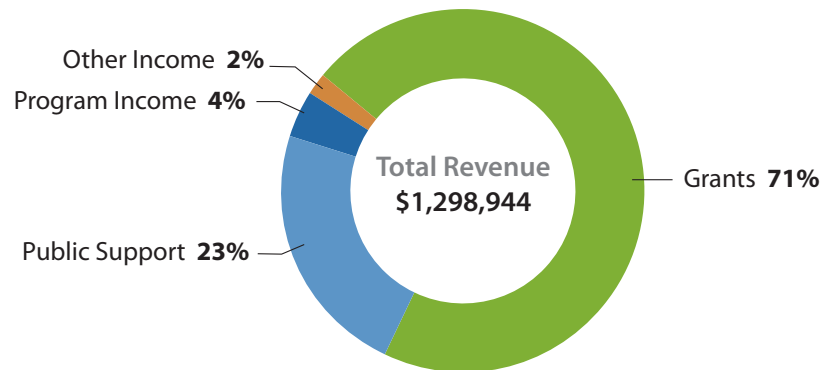
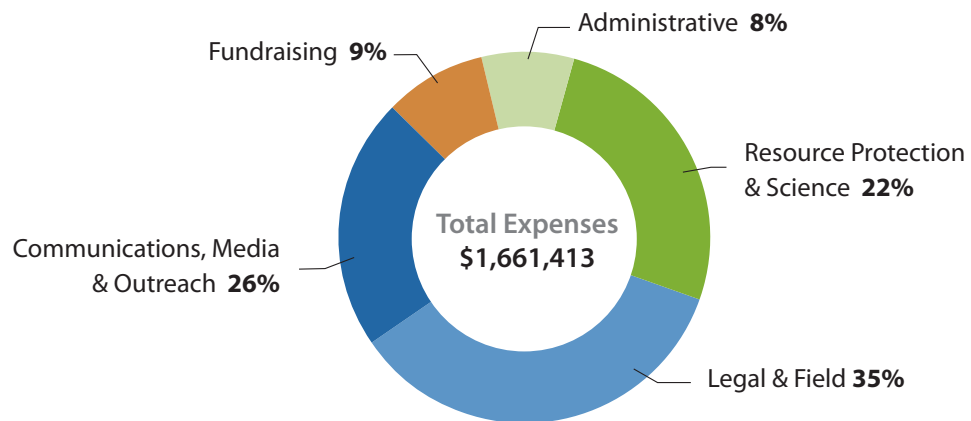


PEER is committed to financial transparency and careful stewardship of our supporter's investment in the organization. We are proud to hold Charity Navigator's highest rating for fiscal responsibility and ethical practices.

**Platinum
Transparency
2023**

Candid.

PEER is proud to hold Candid's Platinum Transparency Rating.



ASSETS \$ 756,585.20

LIABILITIES \$ 262,139.77

These financial results are unaudited and rounded to the nearest dollar. Please visit our website at www.peer.org for complete audited financials that are GAAP compliant. The October 2023-September 2024 audited financial statement will be posted on our website in March of 2025.

Giving Stock or Distributions from your IRA is Easy!

We are deeply grateful for your generosity, and want to let you know how easy it is to make an even greater impact by giving stock or distributions from your IRA. Thank you for considering these meaningful ways to support our work! Learn more at peer.org/donate/ways-to-give

IRA Gifts

If you are 70 ½ years old, you can give up to a maximum of \$100,000 per year from your IRA directly to a qualified charity like PEER without having to pay income taxes on the money.

Stocks and mutual funds

When you donate appreciated stock in support of our mission, you can reduce or even eliminate federal capital gains taxes on the transfer. You may also be entitled to a federal income tax charitable deduction based on the fair market value of the securities at the time of the transfer. When you donate securities to PEER, you receive the same income tax savings that you would if you wrote a check, but with the added benefit of eliminating capital gains taxes on the transfer, which can be as high as 20 percent.



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It's refreshing to stand together in community. Join us by signing up for PEERMail, our bi-monthly e-newsletter.



SCAN TO SUBSCRIBE



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Thank You for Supporting Environmental Whistleblowers

This year has been nothing short of extraordinary, with PEER taking on a significant number of cases that shine a light on agency wrongdoing and environmental threats and defend the rights of public employees. In these challenging times, the PEER community has risen to the occasion—giving generously of their time, expertise, and financial resources. Your steadfast support and unshakeable belief in our mission have fueled every step of this journey. We are deeply grateful for your commitment and trust in PEER.

If you are interested in making an investment in PEER, you can do so at peer.org/donate. Thank you for joining us in this effort.

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