

## 02\_Frawley\_bibliography

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### ANNOTATED BIBLIOGRAPHY — John P. Frawley (toxicologist)

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Machine-readable versions: **frawley.bib** (BibTeX, with `annotate` evidentiary notes) and **frawley.csl.json** (CSL-JSON). This file is the human-readable index with evidentiary role and **COI/IBT flags**.

**Method:** PubMed E-utilities `Frawley JP` (32 PMIDs) + CrossRef + Google Scholar + HeinOnline, deduplicated and disambiguated against the identity fingerprint. **27 publications** are attributed to the toxicologist (1950–1989). Flags: **[FDA]** FDA-era · **[HERC]** Hercules product/affiliation · **[IBT]** Industrial Bio-Test data or co-author J. C. Calandra (IBT president) · ★ dossier-critical. Two items are MEDIUM-confidence attributions (1956 "Nerve poisons"; 1964 "Emergency Exposure Limits").

#### FDA Division of Pharmacology era (1950–1959)

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1. **1950** [FDA] Fitzhugh, Nelson & Frawley — BHC chronic toxicity. *JPET* 100(1):59–66. PMID 14774791.
2. **1951** [FDA] ★ Fitzhugh, Nelson & Frawley — **synthetic sweeteners**. *JAPhA* 40(11):583–586. DOI 10.1002/jps.3030401117. **(full text held.)** Judged **saccharin & cyclamate "relatively nontoxic"** (clean at  $\leq 1\%$ ); flagged then downplayed a saccharin abdominal-lymphosarcoma signal at 5% — the very sweeteners that became the cyclamate (1969) and saccharin/Delaney (1977) battlegrounds he later denounced.
3. **1951** [FDA] Davidow & Frawley — BHC isomer distribution. *PSEBM* 76(4):780–783. PMID 14844348.
4. **1952** [FDA] Frawley, Hagan & Fitzhugh — organophosphate anticholinesterases. *JPET* 105(2):156–165.
5. **1956** Frawley — "Nerve poisons." *Int. Rec. Med.* 169(1):41–42. (attribution *MEDIUM*).
6. **1957** [FDA] ★ Frawley, Fuyat, Hagan, Blake & Fitzhugh — **malathion-EPN potentiation** (his FDA classic). *JPET* 121(1):96–106.
7. **1958** Williams ... **Frawley** ... — parathion on human cholinesterase. *AMA Arch. Ind. Health* 18(5):441–445.
8. **1959** [FDA] Fitzhugh, Bourke, Nelson & Frawley — stearic-acid emulsifiers. *TAP* 1(3):315–331. DOI 10.1016/0041-008X(59)90116-4.

## Hercules era — pesticide/food-additive toxicology (1963–1973)

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9. **1963 [IBT][HERC]** Frawley, Weir, Tusing, DuBois & **Calandra** — **Delnav** (dioxathion). *TAP* 5:605–624. *First IBT co-authorship.*
10. **1964 [HERC]** Frawley, Wiebe, Klug & Shelanski — **CMC** (a Hercules product). *FCT* 2:539–543.
11. **1964** Frawley — Emergency Exposure Limits. *AIHA J.* 25:578–586. (*authorship vs committee MEDIUM*).
12. **1965 [IBT]** Frawley, Kohn, Kay & **Calandra** — **BHT** multigeneration reproduction. *FCT* 3(3):377–386.
13. **1965 [IBT]** Frawley, Kay & **Calandra** — **BHT** residue in chickens. *FCT* 3(3):471–474.
14. **1965** Frawley — "Our sacred food — a perspective." *FCT* 3:117–119.
15. **1965** Frawley — "Suds and sensitivity." *FCT* 3:122–124.
16. **1965 [HERC][IBT] ★** Frawley — **Rosin products** safety. *Proc. Naval Stores Work Conf.*, pp. 65–70. *IBT contracting stated verbatim; the de minimis commercial driver. (Naval Stores Review 74(12):4 (1965) = trade write-up of the same talk, not a separate paper.)*
17. **1966 [HERC]** Kinoshita, Frawley & DuBois — DDT/**toxaphene** microsomal induction. *TAP* 9:505–513. DOI 10.1016/0041-008X(66)90011-1.
18. **1967 [HERC][IBT] ★★** Frawley — "**Scientific Evidence and Common Sense...**" (the de minimis paper). *FCT* 5(3):293–308. PMID 4861454.
19. **1968 ★** Frawley — "A Reasoned Approach to Regulation Based on Toxicologic Considerations." *Food Drug Cosm. Law J.* **23(5):260–270** (May 1968). [**P — read in full; local papers/food\_drug\_1968\_v23\_n5.pdf**]. Published text of his address to the **FDA National Conference on Indirect Food Additives, 13 Feb 1968**; the law-audience companion to the 1967 FCT thesis (245 chronic studies; the 0.1 ppm / 0.2% rule for Reg. 121.2500(d)).
20. **1968** Frawley — "**O. Garth Fitzhugh**" (tribute to his FDA mentor). *FCT* 6(2):121–122.
21. **1968** DuBois, Kinoshita & Frawley — aliesterase/cholinesterase inhibition. *TAP* 12(2):273–284.
22. **1971** Su, Kinoshita, Frawley & DuBois — 18 organophosphates. *TAP* 20(2):241–249.
23. **1971** Borzelleca ... **Frawley** ... Hayes, McCollister, Scala — letter. *Science* 174(4009):545–546.
24. **1973 [IBT]** Kennedy, **Frawley** & **Calandra** — multigeneration pesticide reproduction. *TAP* 25(4):589–596. *Most IBT-entangled; secondary source mis-renders "Frawley MP"*.

## Late career — *Regulatory Toxicology and Pharmacology* (1981–1989)

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25. **1981 ★** Frawley — "**The 1980s — A decade of change**" (inaugural RTP issue; delivered Williamsburg, Jun 1980). *RTP* 1(1):3–7. PMID 7186152. (**full text held.**) His ideological manifesto: attacks "zero risk"/Delaney, risk-assessment statistics, and **GLPs** ("a reputation built on a career of integrity is

worth nothing today") — pointed, given GLPs were FDA's response to the **IBT** fraud. See 06\_ANALYTIC\_MEMO §2.3.

26. **1985** Frawley — "Editorial." *RTP* 5(3):239.

27. **1989** Frawley — "**Our sacred food — a perspective**" (reprise). *RTP* 9(3):209–211. PMID 2667039.

## Archival / unpublished primary items (not journal pubs — see DOCUMENT REGISTER)

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- **1965-03-19** Rowe → **Frawley** dioxin-meeting letter (*recipient*) — Poison Papers B 1575 / DocumentCloud 3253794.
- **1967-11-30 / 1968 / undated** Frawley letters to the NAS Food Protection Committee, FDA Hearing Clerk, R. L. Hall — UCSF Darby Papers qngd0228, **yhgd0228** (Ad Hoc Committee on Insignificant Levels), xygd0228, xmfd0228.
- **1971-03-04** Frawley & Hart → Upholt, Bionetics 2,4,5-T study — UCSF rxfb0228.
- **Unpublished data** cited in his own 1967 paper: "Hercules Incorporated" (ref. 3) and "Industrial Bio-Test Laboratories" (ref. 26).

## Excluded same-name (impostors / contested)

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- **EXCLUDED** — 2019 sea-fireflies paper (*Proc. R. Soc. B* 286:20182621; PMID 30963873): a UC Santa Barbara marine biologist.
- **CONTESTED** — eight **1955 combat-casualty papers** (with Howard JM & Artz CP) and the **46th MASH "1st Lt. J. P. Frawley" (1953)**: the bibliography agent excluded these as a *different* (Army surgical-research) Frawley; the biography agent identified the MASH officer as the *same* man. The toxicologist's **1953–55 publication gap** is consistent with military service. **Unresolved** — flagged in the dossier Biography section; **do not assert either way** without a NARA military record or a Who's Who entry.
- **NEW namesake (from ToxicDocs full text)** — a **second "John P. Frawley, Ph.D."** worked on **chronic beryllium poisoning / pulmonary function** (occupational-lung, ~1949, PHS/Cincinnati milieu). Distinct from our FDA → Hercules food/regulatory toxicologist. Do **not** attribute 1949–early-1950s beryllium/occupational-lung items to our man. (So there are ≥2, probably 3, mid-century "John P. Frawley"s — counting the unresolved 1953 MASH officer.)
- **Correction**: there is **no Frawley-authored PCB paper**. A 1969 Monsanto "PCB hepatic-microsomal-enzyme" preprint (Street, Urry, Wagstaff & Blau) merely **cites** the 1966 Kinoshita–Frawley–DuBois paper. (His 1966 work was, however, circulated in Monsanto's PCB defense.)
- Non-targets to keep discarding: Fr. John Frawley (priest, d. 2013); Patrick J. Frawley Jr. (Schick/Technicolor, d. 1998); William Frawley (linguist).

## COI / IBT summary

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- **IBT thread**: items 9, 12, 13, 24 (and the 1965 rosin program, item 16, and the 1967 paper's ref. 26) rest on data from or co-authored with **Industrial**

**Bio-Test Laboratories** (J. C. Calandra, president) — the lab whose late-1970s data-fraud scandal voided large swaths of pesticide/additive safety testing. Frawley's multigeneration-reproduction work (items 12, 24) is the exact study type later found fraudulent at IBT.

- **Hercules-product thread:** items 10 (CMC), 16 (rosin), 17 (toxaphene), 18 (rosin/packaging) concern products Frawley's employer sold — the same products his de minimis proposal would have deregulated.
- **No contemporaneous formal COI disclosure** beyond his Hercules by-line was located in period sources (absence-of-evidence).