

Comments on Behalf of the North American Metals Council

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Gradient
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Meeting of Work Group of the Chartered SAB for the Arsenic Cancer Review
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My Main Points:

- Dose-Response Modeling of Taiwanese Dataset
- Need for Weight-of-Evidence
 - Across Epi Studies
 - With MOA Evidence for Nonlinearity
- Need to Address the “Spirit” -- and Not Just the Letter -- of Previous SAB Comments

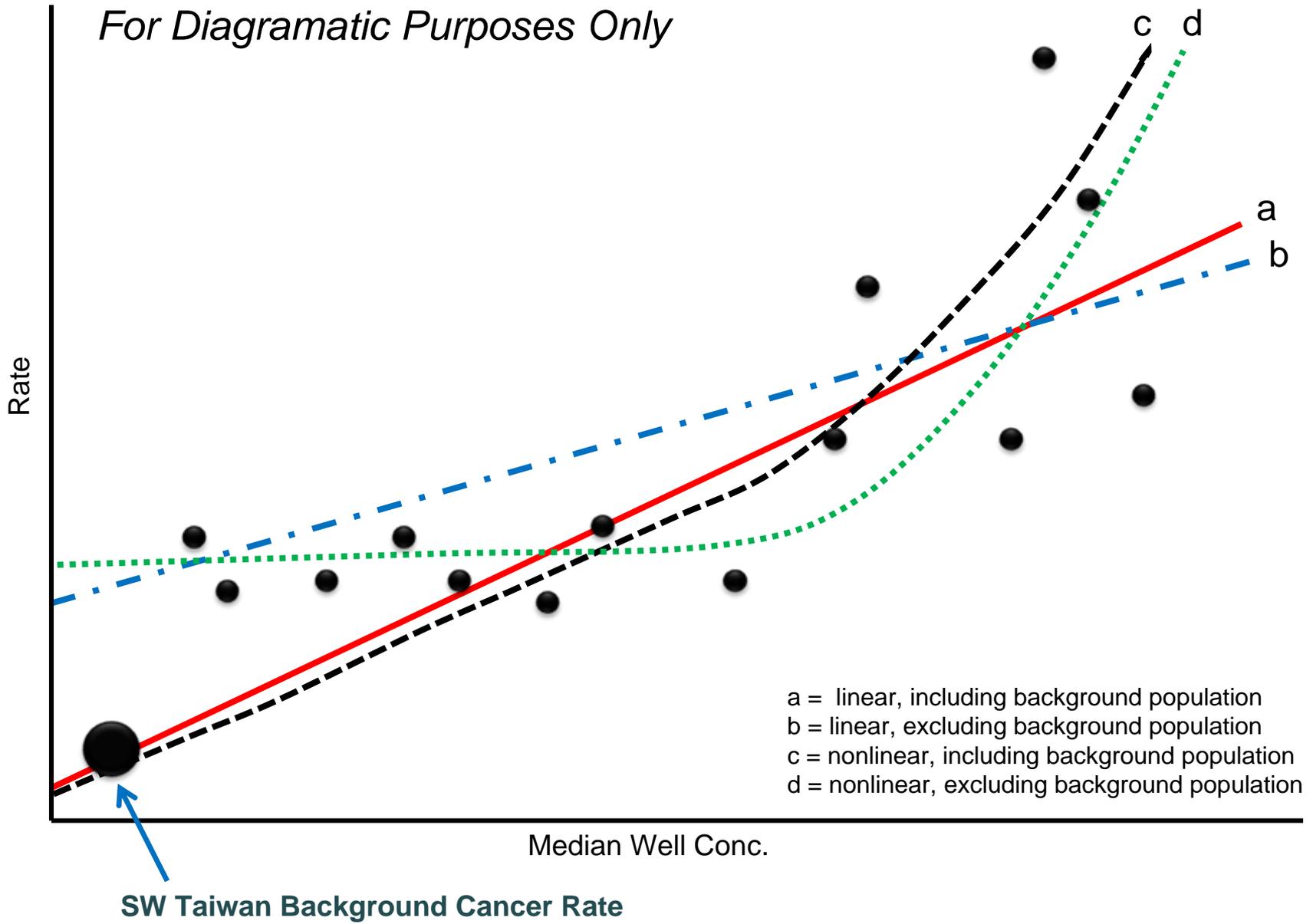
Taiwanese Dataset

- *Ecological* design, [As] varies geographically
- *Other* factors (than As) locally different
- High *baseline* cancer rates, even when low [As] (compared to outside reference populations)
- These affect D-R modeling

- THEREFORE -- important to explore and characterize these, and to compare with results in other human populations



For Diagrammatic Purposes Only



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