

Public Comments from Francine Laden

I am Francine Laden, Professor of Environmental Epidemiology at the Harvard TH Chan School of Public Health and past president of the International Society of Environmental Epidemiology (ISEE). I have published extensively on air pollution exposures and various health effects. Furthermore, I was a standing member of the EPA Scientific Advisory Board, I sat on the CASAC CO panel, and I was a member of the IARC working group that concluded that air pollution is a human carcinogen.

I am writing to express my grave concern with the October 2018 CASAC memo written by A Cox regarding the ISA for PM2.5. In contrast to the authors of the memo, I feel that the process undertaken by the ISA committee to review the existing literature was appropriate. They evaluated the strengths and weaknesses of the studies and considered the differences in the study designs, including exposure assessments and outcome definitions appropriately. The conclusions of the ISA appropriately took these factors into account when concluding that the overall findings consistently indicate that PM2.5 exposure is associated with risk of adverse health outcomes. Furthermore, the process included review by experts in the field to ensure that no relevant studies were missed and that the conclusions of the ISA represented the current state of the science. On the other hand, the October 2018 CASAC memo did not appreciate the nuances of the literature or the process undertaken by EPA in researching and writing the ISA.

I was actually quite relieved to read that it was acknowledged in the memo that currently CASAC does not include members with the appropriate expertise needed to conduct this review. Given this very concerning situation, the conclusions of the October 2018 CASAC memo must be revisited once an appropriate panel of experts can be reconvened.

Please feel free to contact me with any questions or for further information

Sincerely
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