

Public Comments from Marianthi-Anna Kioumourtzoglou

I am writing in response to the current CASAC memo regarding the October 2018 PM_{2.5} ISA draft.

I was very surprised to read the Committee's recommendation for a development of a second draft ISA. As one of the authors for the October Draft, I can attest that we followed a very strict protocol of reviewing epidemiologic papers, assessing the validity and appropriateness of the methods used in each paper, the robustness of the results, as well as the interpretation of those results based on the methods used. Our conclusions are not based on any single study; instead, upon review of many well-designed and conducted studies with different study designs and among different study populations, with very different potential sources of confounding and other biases, our conclusions are based on the comprehensive and collective body of evidence we found across all studies we reviewed. It should be noted that we also included studies using causal inference methods that reported comparable—and also statistically significantly harmful—effects. We used objective criteria to assess the validity of each single study that we included; no decision was based on “subjective judgements”. As air pollution epidemiologists (an expertise notably lacking from the Committee), we are trained to identify faulty designs, and inappropriate use of statistical methods and interpretation of results. If some studies were not included in the final ISA draft, therefore, the reason is that they did not pass our rigorous quality control.

I would, therefore, please urge you to reconsider your recommendation.

Please do not hesitate to contact me if you have any further questions.

Sincerely,
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