



**Statement of Stewart E. Holm, Chief Scientist
American Forest & Paper Association
American Wood Council**

Before

**Clean Air Scientific Advisory Committee on EPA's Draft Integrated Science
Assessment (ISA) for Ozone and Related Photochemical Oxidants**

**Public Meeting of the Clean Air Scientific Advisory Committee
December 4, 2019**

Chairman Cox, and Members of the Committee, good Morning, my name is Stewart Holm, and I am Chief Scientist at the American Forest & Paper Association (AF&PA) and the American Wood Council (AWC). I appreciate the opportunity to provide comments to the Clean Air Scientific Advisory Committee (CASAC) on the draft Integrated Science Assessment for Ozone and Related Photochemical Oxidants. Our organizations are committed to reducing emissions as necessary to provide air quality protective of public health and welfare, consistent with the Clean Air Act. Our members have worked with EPA and the states to lower ambient levels of ozone, all while the U.S. economy, population and energy use have grown steadily

The American Forest & Paper Association (AF&PA) serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative — [*Better Practices, Better Planet 2020*](#). The forest products industry accounts for approximately four percent of the total U.S. manufacturing GDP, manufactures over \$200 billion in products annually and employs approximately 950,000 men and women. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 45 states.

The American Wood Council is the voice of North American wood products manufacturing, an industry that provides almost 450,000 men and women in the United States with family-wage jobs. AWC represents 86% of the structural wood products industry, and members make products that are essential to everyday life from a renewable resource that absorbs and sequesters carbon. Staff experts develop state-

of-the-art engineering data, technology, and standards for wood products to assure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations. AWC also advocates for balanced government policies that affect wood products.

Thank you for the opportunity to comment on the draft ISA for ozone. This document fulfills EPA's obligation under the Clean Air Act to prepare air quality criteria that accurately reflects the latest scientific knowledge regarding the effects of a pollutant in the ambient air on public health and welfare. The Clean Air Act requires review of the draft ISA by you -- CASAC. Although you are required to review and make recommendations for appropriate revisions to the ISA, the Clean Air Act does not require you to approve, or reach closure on, the document. EPA must simply consider your comments and the comments from the public carefully when finalizing the ISA.

Furthermore, although EPA has previously sought CASAC review and public comment on multiple drafts of an ISA, the Clean Air Act does not require more than one draft. The preparation of a single draft of the ISA is particularly appropriate here, as EPA must complete its current review of the ozone NAAQS by October 2020 in order to meet its statutory deadline. To comply with the deadline, it is necessary to delay addressing any remaining uncertainties about the relevant science until the next NAAQS review, which should begin immediately following the current one.

AF&PA/AWC submitted detailed comments on the draft ISA to EPA yesterday but would like to make a few high-level points today. First, we support the use in the ISA of the new Population Exposure, Comparison, Outcome and Study (or PECOS) approach to identifying and evaluating peer-reviewed publications, and believe it is an improvement over past ISAs.

Next, the draft ISA includes changes from the previous 2013 ISA to assessments of the strength of the evidence that short- or long-term exposure to ozone causes health effects. We agree with EPA's changes from the 2013 ISA to indicate that the scientific evidence is only suggestive of a causal relationship between short-term ozone exposure and cardiovascular effects and total mortality. These changes are appropriate. We do not agree, however, with the draft ISA's determination that a causal association likely exists between short- and long-term exposure to ambient ozone and metabolic effects. Further, EPA should reconsider its decision to retain the causal determinations for the relationship between short- and long-term ozone exposure and respiratory effects. As our comments to EPA explain further, the evidence does not indicate that long-term ozone exposure below the current ozone standard likely causes adverse respiratory effects. Rather, the evidence is better stated as "suggestive of, but not sufficient to infer, a causal relationship between long-term ozone exposure and respiratory effects" when the current standard is attained.

Thank you very much for the opportunity to comment.