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Beate Ritz, M.D., Ph.D., *President*
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Re: CASAC Draft Particulate Matter Report

I am writing to you as the President of the International Society for Environmental Epidemiology (ISEE) – one of the largest scientific societies in the area of environmental health. A large proportion of our membership is comprised of scientists who conduct air pollution studies in human populations all over the world addressing a wide range of health outcomes.

Reviewing the CASAC Draft Particulate Matter (PM) Report, our members have identified many serious flaws in the argumentation about human health effects and the epidemiologic evidence concerning particulate matter related health effects. We also recognize that Louis Anthony (Tony) Cox Jr., who will over-see the committee's review of the science assessment, proposed in a draft letter to the EPA to limit the studies that inform EPA's causality determinations to only those that can pass a specific and very narrow approach of 'manipulative causality'. This approach is likely to harm public health under the guise of promoting a "more precise statistical viewpoint." We strongly oppose this change and urge you to instead conduct a qualified weight-of-the-evidence approach for causal determinations based on the work of Sir Bradford Hill in 1965 and a 1964 report from the U.S. Surgeon General, that has been practiced for decades by accredited institutions including the Institute of Medicine of the National Academy of Sciences of the USA and is deeply rooted in the scientific community's effort to evaluate the relationship between cause and effect based on all scientific evidence in concert. We believe that a science assessment that fails to provide a comprehensive assessment of air pollution health effects will result in a flawed risk and exposure assessment and policy analysis. Decision-makers must have access to reports that consider all available scientific evidence and use the best approach to evaluate them and prevent policy decisions from harming public health.

Furthermore, we completely agree with the CASAC reviewers' statement that the current CASAC committee lacks expertise needed for a qualified review of epidemiologic studies and to put the human evidence into the context of other sciences. We also urge you to follow the recommendations of several CASAC members who requested the reappointment of the previous PM panel of experts i.e. several original and highly qualified members.

Sincerely,

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References

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