

November 17, 2021 Final

Enstrom Verbal Comments on September Supplement to 2019 EPA PM Integrated Science Assessment

The September Supplement to the 2019 PM ISA must be objectively redone because it deliberately falsifies and exaggerates the adverse health effects of PM_{2.5} and incorrectly claims that PM_{2.5} causes premature deaths. The ISA focuses almost exclusively on the positive associations between PM_{2.5} and mortality that have been promoted by the Chinese-funded Harvard Chan School of Public Health since the publication of Dockery 1993 and Pope 1995. Eight key investigators, including Dominici, Schwartz, Pope, and Bell are cited 171 times. Dominici's 30 Chinese co-authors are cited 263 times. In addition, 8 Canadian investigators are cited 211 times regarding positive associations in Canada that should not be in the ISA.

On the other hand, the ISA does not cite the published null findings and criticism of at least sixty investigators, including myself and prior CASAC Chairs Cox, McClellan, and Wolff. Although there is an ongoing 30-year controversy about claims that PM_{2.5} causes deaths based on "secret science" findings that are not transparent and reproducible, the 303-page ISA does not contain the words controversy, transparency, reproducibility, and integrity. The ISA totally ignores my independent 2017 CPS II reanalysis which found major flaws in Pope 1995 and the 2000 HEI Reanalysis. If my reanalysis had been possible in 1997, the PM_{2.5} NAAQS might never have been established.

Most of the recent US evidence on PM_{2.5} deaths in the ISA is based on very complex statistical analyses of US Medicare records. However, I have been unable to confirm that Dominici, Schwartz, Bell, Zigler, Shi, and others have proper authorization to use Medicare records for methodologically flawed air pollution epidemiology. Sixty-nine million Americans, including myself, have NEVER granted permission for our private Medicare records to be used for ecological research that violates basic epidemiologic principles and produces weak associations that are claimed to be causal. Furthermore, I believe that individual Medicare recipients can be identified from the detailed "de-identified" information used by Dominici, et al. Such identification would directly violate Americans' HIPAA privacy rights.

In addition to falsification of the published research record, the ISA does cite any of the unpublished null PM_{2.5} findings that have been rejected by the many prominent journals that publish positive PM_{2.5} findings. For instance, SCIENCE rejected without review my proposed response to its repeated opposition to the EPA Transparency Rule. JAMA rejected my Letter to the Editor pointing out that their Fineberg-Allison Viewpoint opposing EPA Transparency did not cite my 2017 reanalysis. NEJM rejected my Letter to the Editor countering the NEJM Sounding Board "The Need for a Tighter Particulate-Matter Air-Quality Standard" by CASAC Chair Sheppard and her co-authors.

Thus, Sheppard and other members of the PM Panel are already unequivocally in favor of tightening the PM_{2.5} NAAQS of 12 ug/m³, without regard to the extensive contrary evidence by at least sixty PM_{2.5} critics. There is no etiologic mechanism by which inhaling 100 ug of PM_{2.5} per day can cause death and the US already has a very low PM_{2.5} level of 7 ug/m³ whereas our competitor China has the very high level of 48 ug/m³. Thus, I am making a very strong case to Americans that tightening the PM_{2.5} NAAQS will hurt America.

N=525 words

November 17, 2021 Final

Enstrom Verbal Comments on October 2021 EPA PM Policy Assessment

The October PM PA must be objectively redone because it deliberately exaggerates the adverse health effects of PM_{2.5} and makes policy recommendations that are based on invalid claims that PM_{2.5} causes premature deaths. The PA focuses almost exclusively on the positive associations between PM_{2.5} and mortality that have been promoted by the Chinese-funded Harvard Chan School of Public Health since the publication of Dockery 1993 and Pope 1995. Eight activist US investigators, including Dominici, Schwartz, Pope, and Bell are cited 315 times. Dominici's 30 Chinese co-authors are cited 399 times. In addition, 8 activist Canadian investigators are cited 353 times regarding positive associations in Canada that should not be in the PA.

On the other hand, the PA does not cite the published null findings and criticism of at least sixty investigators, including myself and prior CASAC Chairs Cox, McClellan, and Wolff. Although there is an ongoing 30-year controversy about claims that PM_{2.5} causes deaths based on findings that are not transparent and reproducible, the 649-page PA does not contain the words controversy, transparency, reproducibility, and integrity. The PA totally ignores my independent 2017 CPS II reanalysis showing major flaws in Pope 1995 and the 2000 HEI Reanalysis. If my reanalysis had been possible in 1997, the PM_{2.5} NAAQS might never have been established. Rather than acknowledging my reanalysis and errors in PM_{2.5} death claims, HEI has increased funding of research associating low level PM_{2.5} with deaths.

Most of the recent US evidence of PM_{2.5} deaths is based on complex statistical analyses of US Medicare records. However, I have been unable to confirm that Dominici, Schwartz, Bell, Zigler, and Shi have proper authorization to use Medicare records for methodologically flawed air pollution epidemiology. Sixty-nine million Americans, including myself, have NEVER granted permission for our private Medicare records to be used for ecological research that violates basic epidemiologic principles and produces weak associations that are claimed by EPA to be causal. Furthermore, I want the opportunity to show that individual Medicare recipients can be identified from the detailed "de-identified" information used by Dominici and her co-authors. Because of their extensive use of Medicare records, I expect PM Panel members Bell and Zigler to give me this opportunity.

As previously noted, Sheppard and other members of the PM Panel are unequivocally in favor of tightening the PM_{2.5} NAAQS of 12 ug/m³, without regard to the extensive contrary evidence by at least sixty PM_{2.5} critics. Keep in mind, there is no etiologic mechanism by which inhaling 100 ug of PM_{2.5} per day can cause death and the US already has a very low PM_{2.5} level of 7 ug/m³ whereas our competitor China has the very high level of 48 ug/m³. Given these facts, the Biden EPA should not be focused on tightening the PM_{2.5} NAAQS while the Chinese are sending their PM_{2.5} across the Pacific Ocean to America, building new coal power plants, testing new hypersonic missiles, and elevating President Xi to the historic status of Mao Zedong. Finally, the PM Panel should be aware of the writings of renowned journalist John Tierney on "The Left's War on Science," of renowned physicist Lawrence Krauss on the "Ideological Corruption of Science," and of Enstrom on environmental Lysenkoism in the US.

N=536 words