

Statement to SAB Supporting EPA Proposed Rule *Strengthening Transparency in Regulatory Science*

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I thank the Science Advisory Board for working so hard on these difficult EPA issues. I have strong evidence that the proposed EPA Transparency Rule is necessary in order to increase the scientific validity and transparency of the research findings used to justify EPA regulations. I demonstrated the importance of this rule when I published my independent 2017 reanalysis of the ACS CPS II cohort data underlying the seminal Pope 1995 analysis used to justify the 1997 PM2.5 NAAQS. My reanalysis found NO robust relationship between PM2.5 and total mortality in the CPS II cohort and it challenges the validity of the positive relationships in Pope 1995, HEI 2000, and HEI 2009. My reanalysis did not violate subject confidentiality and NO errors have been identified in my reanalysis. Since 2017 Pope has falsified the research record by not citing Pope 1995, HEI 2000, and Enstrom 2017.

I recommend the following modifications of the EPA Transparency Rule. Before being required to release de-identified raw data, an Investigator who has published findings that are used for EPA rule making should be required to 1) voluntarily cooperate with legitimate peer critics in conducting additional analyses in order to resolve any legitimate controversy about the investigator's published findings, and 2) reveal the names and comments of the peer reviewers who recommended publication of the investigator's findings because the peer review system has been corrupted. Adding to the existing critiques by CASAC and SAB, my 22-page January 14 Comment documents that both the PM Integrated Science Assessment and PM Policy Assessment have many serious problems, particularly the pseudoscientific claims by numerous PM2.5 investigators and EPA staff that PM2.5 causes premature deaths in the US. These serious problems provide strong justification for the Transparency Rule. Please examine my detailed evidence. Thank you very much.