

CFACT to American Cancer Society: Reject EPA's politicized emissions standards

By [Craig Rucker](#) | August 8th, 2023 |



Mr. Brian A. Marlow, CFA
Chairman, Board of Directors
American Cancer Society
3380 Chastain Meadows Pkwy NW, Suite 200
Kennesaw, GA 30144

Re: ACS and EPA misuse CPS II to claim deaths from PM2.5

Dear Mr. Marlow,

With headquarters in Washington, DC, the Committee For A Constructive Tomorrow (CFACT) is a 501(c)(3) national and international environmental and educational organization dedicated to protecting both wildlife and ecological values *and* the health, nutrition, energy needs and living standards of people, families and communities. CFACT is also committed to evidence-based decisions, policies and programs that are guided by the best possible scientific data and analyses.

We are deeply concerned about the American Cancer Society's support for the current Environmental Protection Agency (EPA) plan to further tighten the PM2.5 National Ambient Air Quality Standard (NAAQS) for particulate matter, which has been based largely on findings from the Society's 1982 Cancer Prevention Study (CPS II).

CFACT respectfully requests that ACS scientists Dr. Karen Knudsen, Dr. Alpa Patel, and Mr. Ryan Diver meet with environmental epidemiologist Dr. James E. Enstrom as soon as possible to discuss his CPS II findings, along with further concerns that we summarize below.

We understand that ACS scientists have rejected Dr. Enstrom's repeated requests to meet with him regarding his peer-reviewed evidence of serious errors by ACS scientists in their analyses of CPS II data that attempt to link air pollution to mortality. The Society's CPS II analysis found a positive relationship between mortality and PM2.5 emissions – and EPA utilized this relationship to help justify its initial NAAQS for PM2.5 in 1997.

Subsequently, the Obama EPA based parts of its Clean Power Plan on significant errors and misstatements about air quality, especially PM2.5 emissions. The Biden Administration and EPA are doing likewise, often citing CPS II and similar analyses to justify even tighter PM2.5 standards, as part of their ongoing efforts to close the nation's coal-fired power plants, and even eliminate natural gas use.

Those errors are exemplified by testimony to congressional committees by former EPA Administrator Gina McCarthy and other EPA witnesses. Ms. McCarthy asserted that there is no threshold below which there is no risk, no level "at which premature mortality effects do not occur." That is simply false.

In reality, cigarettes quickly send hundreds of times more tiny PM2.5 particles into a smoker's lungs than what the EPA says is lethal if they come from coal-fired power plants. Cigarettes certainly pose cancer and other risks, but millions are not dying from inhaling PM2.5 particles.

Equally damaging to EPA (and ACS) assertions, Agency-funded experiments on human test subjects administered PM2.5 particles to dozens of people – including elderly, asthmatic and diabetic subjects, people with heart disease and children who EPA says are most at risk from PM2.5 particles. Those experiments exposed these test subjects to thirty or even sixty times more PM2.5 particles per volume than what the EPA claims are dangerous or lethal – and did so for up to two hours. And yet, contrary to EPA and Ms. McCarthy's claims, no one died or even got sick from those exposures.

This underscores how false and misleading EPA claims have consistently been about the “serious risks” from coal-based electricity and other sources of PM2.5 particles. And yet the agency has repeatedly used such claims to justify tightening its NAAQS restrictions.

In summary, there is strong evidence that the PM2.5 standards cannot be justified on scientific, economic, or human health grounds; that EPA's current PM2.5 regulations have had adverse economic, energy reliability and health impacts on American families, industries, and businesses; and that EPA's asserted benefits from PM2.5 restrictions are illusory or heavily offset by such adverse consequences.

And yet, ACS scientists have failed to discuss or address the strong evidence contained in Dr. Enstrom's February 16, 2003 letter to ACS scientists: “ACS & EPA Misuse CPS II to Claim PM2.5 Deaths” (<http://ScientificIntegrityInstitute.org/ACSEPA021623.pdf>). Dr. Enstrom clearly described this evidence in his July 8, 2023 Talk “Corruption of Science by the American Cancer Society” at the Doctors for Disaster Preparedness Meeting in Tucson, Arizona (<https://www.YouTube.com/watch?v=GNjR4ft3xG4>), which CFACT experts attended.

This is an urgent matter, because EPA is once again using seriously flawed epidemiologic findings in its latest efforts to further lower the already too-low PM2.5 NAAQS. Evidence by Dr. Enstrom and studies by other experts demonstrate that there is no factual or scientific justification for this.

If the ACS scientists cannot meet with Dr. Enstrom, then we request that you speak with me or CO2 Coalition Executive Director Gregory Wrightstone about the importance of honest, reproducible science to our nation's affordable, reliable energy; the jobs, economic wellbeing and overall health of America's workers and families; and indeed the continued credibility of ACS epidemiologic research.

Mr. Wrightstone has already written to the Society. His March 31, 2023 CO2 Coalition Letter to ACS can be found here: <http://ScientificIntegrityInstitute.org/CO2ACS033123.pdf>. CFACT supports his analysis and hopes the ACS recognizes the importance of the issues we both raise.

Thank you very much for considering this request.

Sincerely yours,

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