

From: **James E. Enstrom** <jenstrom@ucla.edu>  
Date: Mon, Nov 28, 2022 at 11:30 AM  
Subject: Request re ACS CPS II Reanalysis & PM2.5 NAAQS  
To: Karen E. Knudsen <karen.knudsen@cancer.org>  
Cc: William L. Dahut <bill.dahut@cancer.org>, Alpa V. Patel, PhD <alpa.patel@cancer.org>

November 28, 2022

Karen E. Knudsen, PhD, MBA  
American Cancer Society CEO  
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Dear Dr. Knudsen,

I am writing to request your assistance regarding use of the 1982 ACS Cancer Prevention Study (CPS II) cohort since 1995 to claim that fine particulate air pollution (PM2.5) causes premature deaths. Former ACS Vice President of Epidemiology Susan M. Gapstur and former ACS CEO Gary M. Reedy refused to address my concerns that CPS II data have been misused (<http://scientificintegrityinstitute.org/Reedy081717.pdf>). My March 28, 2017 peer-reviewed reanalysis of the CPS II cohort found NO significant relationship between PM2.5 and mortality (<http://journals.sagepub.com/doi/10.1177/1559325817693345>). In addition, on December 10, 2021 I presented an even more compelling case to the EPA CASAC PM Panel that PM2.5 DOES NOT cause deaths (<http://scientificintegrityinstitute.org/PMPanel121021.pdf>). This matter is highly relevant to both epidemiologic integrity and the US economy. The EPA CASAC has proposed tightening the National Ambient Air Quality Standard (NAAQS) for PM2.5 based largely on the claim that the low levels of PM2.5 in the US cause deaths. Such tightening could occur as soon as March 2023 and this would result in new multi-billion dollar EPA PM2.5 regulations that are scientifically and economically unjustified (<https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202204&RIN=2060-AV52>).

Thus, I request that ACS Senior Vice President of Population Science Alpa V. Patel and/or ACS Chief Scientific Officer William L. Dahut review my 2017 CPS II reanalysis and then produce transparent results that either confirm or refute my CPS II evidence. This review can be done very rapidly if ACS epidemiologists will simply perform the same calculations that are in my reanalysis. CPS II results played the major role in EPA's 1997 establishment of and 2012 tightening of the PM2.5 NAAQS. The PM2.5 NAAQS has been highly controversial since it was established and many experts like myself believe that PM2.5 regulations are not scientifically justified. The ACS has an obligation to conduct transparent and reproducible scientific findings, especially when these findings have national policy implications. Finally, ACS should focus on its stated Mission "to improve the lives of people with cancer and their families through advocacy, research, and patient support, to ensure everyone has an opportunity to prevent, detect, treat, and survive cancer." The relationship between PM2.5 and mortality has NOTHING to do with cancer risk.

Thank you very much for your consideration and assistance.

Sincerely yours,

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