

An Overview of the Attacks on the Clean Air Scientific Advisory Committee (CASAC)

Why Taking the Science Out of Air Quality Endangers Public Health

December 10, 2018

The U.S. Environmental Protection Agency (EPA) is attempting to short-circuit the scientific review of national ambient air quality standards (NAAQS). These changes are inconsistent with requirements of the Clean Air Act and well-established precedent, and might lead to endangering the health of millions of Americans.

Under the Clean Air Act, EPA is required to conduct regular reviews of national air quality standards for major pollutants, and to revise these standards if the latest science indicates that they are not adequately protecting public health. It is now reviewing standards for PM and ground-level ozone, pollutants that are associated with significant health effects. Despite significant progress, today more than 120 million Americans live in areas that violate one or both of these standards.

To assist in the scientific and standard reviews for these pollutants, EPA is required to appoint an independent group of seven air quality experts to serve on the CASAC. These reviews, especially PM and ground-level ozone, require a breadth and depth of expertise that cannot be achieved with just seven people. Thus, for the last four decades, EPA has organized panels of additional experts to help the CASAC review the latest research and the standards.

On October 10 and 11, 2018, with no opportunity for CASAC or public input, or reasonable explanation, Acting Administrator Wheeler decided not to form an Ozone Review Panel and to disband the Particulate Matter Review Panel. Wheeler then announced five new members of the CASAC and [tasked](#) the newly formed CASAC with leading the review of both ozone and PM.

In many ways, Wheeler's recent actions implement changes originally proposed by former EPA Administrator Scott Pruitt. On October 31, 2017, Pruitt wrote a memo that excluded experts who received EPA research grants from serving on the CASAC, prioritized geographic diversity over scientific integrity, and called for more member turnover. On May 9, 2018, Pruitt issued another memo that shortened the time for CASAC's work, commingled reviews of science and policy that were previously kept separate, and expanded the scope of CASAC reviews to include implementation issues that are illegal to consider when setting NAAQS.

The CASAC needs to reject these changes, which harm the quality, credibility, and integrity of the CASAC and the NAAQS science review process, and possibly lead to ill-informed decisions that could harm public health.

- CASAC should immediately call for the formation of an Ozone Review Panel and for the reinstatement of the CASAC PM Review Panel;
- CASAC should recommend that the EPA rescind the October 31, 2017, and May 9, 2018, memoranda by former Administrator Scott Pruitt;
- EPA should allow time for an adequate review for final rules for both ozone and PM;
- Membership criteria for the chartered CASAC and for its augmented panels should emphasize scientific expertise.

Visit EPN's website for more information about [current attacks on the CASAC and public health safeguards](#)

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