

EPN, UCS, and former chartered CASAC Members' Comments for the Public Meeting of the Clean Air Scientific Advisory Committee (CASAC)

July 16, 2026

The [Environmental Protection Network](#) (EPN) harnesses the expertise of more than 800 former Environmental Protection Agency (EPA) career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former regulators and scientists with decades of historical knowledge and subject matter expertise.

The [Union of Concerned Scientists](#) (UCS) is a member-supported nonprofit that puts rigorous, independent science to work to solve our planet's most pressing problems. Joining with people across the country, we combine technical analysis and effective advocacy to create innovative, practical solutions for a healthy, safe, and sustainable future.

EPN and UCS appreciate the opportunity to provide comments for consideration by the Clean Air Science Advisory Committee (CASAC) for the July 22, 2026 meeting.¹ These comments build upon EPN's prior submissions^{2,3} regarding candidate lists for CASAC and the EPA Science Advisory Board (SAB), and are submitted in collaboration with a group of previously chartered CASAC members.

Overview

High-quality, independent science reviews are essential for EPA to protect human health and the environment and for restoring the scientific credibility of the agency. Given the complexities and multidisciplinary attributes of all criteria pollutant reviews, we also stress the critical need to use pollutant-specific expert panels to advise the CASAC in all National Ambient Air Quality Standards (NAAQS) reviews.

Members should have strong scientific expertise and experience

Section 109 of the Clean Air Act specifies that CASAC consist of seven members with at least one each of the following three categories: a member of the National Academy of Sciences, a physician, and a person representing state air pollution control agencies. This committee is required to conduct periodic reviews of the scientific criteria supporting NAAQS as well as the standards themselves, making recommendations to the EPA Administrator on new or revised standards. These core duties, as well as additional requirements for the committee in section 109, clearly indicate that all members must have strong scientific and technical credentials in the most critical disciplines that drive such NAAQS reviews, such as air pollution toxicology, epidemiology, exposure science, atmospheric chemistry, air pollution control, and medicine (e.g. respiratory or cardiovascular health). This includes a critical understanding of the current evidence base.

¹ <https://www.federalregister.gov/documents/2026/07/02/2026-13400/public-meeting-of-the-clean-air-scientific-advisory-committee-casac>

² EPN Comments on Science Advisory Board Candidates for FY2026, available at <https://www.environmentalprotectionnetwork.org/epn-comments-on-science-advisory-board-candidates-for-fy2026/>.

³ EPN Comments on Clean Air Scientific Advisory Committee Nominations, available at <https://www.environmentalprotectionnetwork.org/epn-comments-on-clean-air-scientific-advisory-committee-nominations/>.

Pollutant-specific expert panels should be utilized by CASAC

The highest priority should be placed on complementing the statutory charter members of CASAC with pollutant-specific expert panels for all NAAQS reviews. For decades, these panels have successfully worked closely with the chartered CASAC to provide needed scientific expertise for the standards under review, as well as a broader set of perspectives on the science and standards. While the specific expertise needed on such panels will vary by pollutant, in general, they should include criteria used to select CASAC members.

CASAC is a scientific expert committee, not a representative stakeholder committee

The purpose of CASAC is for the federal government to obtain a consensus opinion of experts in a given field. CASAC is not a “representative” committee and therefore is not intended to reflect the positions and observations of interested groups or stakeholders.

CASAC members should be unconflicted

Per the call for nominations, “absence of financial conflicts of interest and absence of an appearance of a loss of impartiality.” Consistent with well-established and validated past practices, the review of conflicts of interest for new members should be given the priority that it has been traditionally given.

Variety of expertise to meet requirements of Clean Air Act Sections 108 and 109

Section 108 of the Clean Air Act requires that “air quality criteria for an air pollutant shall accurately reflect the latest scientific knowledge useful in indicating the kind and extent of all identifiable effects on public health or welfare which may be expected from the presence of such pollutant in the ambient air, in varying quantities.” Section 109 requires that primary (health) standards based on “such criteria and allowing an adequate margin of safety, are requisite to protect the public health.” As noted in EPA policy assessments, “In addressing the requirement for an adequate margin of safety, the EPA considers such factors as the nature and severity of the health effects involved, the size of the sensitive population(s), and the kind and degree of uncertainties.” As stated, for example, in the 2019 Integrated Science Assessment for particulate matter, “the risk of health effects from exposure to an ambient air pollutant may be modified as a result of intrinsic (e.g., pre-existing disease, genetic factors) or extrinsic factors (e.g., sociodemographic or behavioral factors), differences in internal dose (e.g., due to variability in ventilation rates or exercise behaviors), or differences in exposure to air pollutant concentrations (e.g., more time spent in areas with higher ambient concentrations).” Thus, scientific experts with a variety of expertise, experience, and perspectives on these factors and how they modify risk are critical to the NAAQS review.

Pollutant-specific expertise for ad hoc advisory panels

The scientific review of NAAQS in conformance with Sections 108 and 109 requires breadth and depth of scientific expertise. However, the statutory CASAC is limited to only seven members, and seven members are inadequate to have the needed breadth, depth, and variety of scientific expertise, experience, and perspectives. For decades, CASAC has been augmented with ad hoc review panels that provide advice through the chartered CASAC on the scientific and technical aspects of air quality criteria and the primary and secondary National Ambient Air Quality Standards (NAAQS). In fact, the last time the seven-member CASAC conducted its work without ad hoc panels of experts, they found that they did not have sufficient expertise to advise on the adequacy of the

standards⁴. Per prior EPA requests for nominations, selection criteria to be used for panel membership include: (a) scientific and/or technical expertise, knowledge, and experience (primary factors); (b) availability and willingness to serve; (c) absence of financial conflicts of interest; (d) absence of an appearance of a lack of impartiality; (e) skills working in committees, subcommittees, and advisory panels; and (f) for the panel as a whole, diversity of expertise and viewpoints. CASAC should be augmented with review panels for the ongoing review activities pertaining to lead, ozone, and nitrogen dioxide and for any other review activities that are initiated.

Conclusion

EPA should follow the established practice of previous administrations and Administrators by convening ad hoc expert panels for pollutant-specific NAAQS reviews. These panels bring the breadth and depth of scientific expertise, practical experience, and diverse perspectives that are critical for conducting rigorous, balanced, and credible assessments of the available evidence. Thank you for the opportunity to provide these comments. As we have seen many times in the past, the findings and conclusions of this and other review panels will only be able to be considered credible, be applied, and remain intact if a clear, honest, and balanced review is conducted.

⁴ Letter from L.A. Cox Jr., CASAC Chair, to A. Wheeler, EPA Administrator, April 11, 2019. While no longer available on EPA's website, the letter is discussed on UCS's website with a direct link to the unavailable letter. <https://blog.ucs.org/gretchen-goldman/uncharted-territory-the-epas-science-advisors-just-called-out-administrator-wheeler/>