

Pesticide Truths

JunkScience Petitions White House For Epidemiology Standards – Juris Dr Steven J Milloy Speaks The Truth – 2018 02 20

February 27, 2018 WILLIAM H GATHERCOLE AND NORAH G

Overheard At The Centers For Disease Control

What do you do when you're not selling used cars?

Epidemiology.



Source : Steven J Milloy

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against H.U.E that conspire to destroy the Green space and other industries (NORAHG)

The Wisdom Of Juris Dr Steven J Milloy

**JunkScience Petitions
President Trump To Issue
Epidemiologic Standards
For Federal Agencies**

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HUE that conspire to destroy the Green space and other industries (NORAH)

Please explore the following links ...

The Media Library Of Milloy

<http://pesticidetruths.com/toc/milloy/>

The Wisdom Of REAL Experts

<http://pesticidetruths.com/2014/11/14/the-wisdom-of-real-experts-who-speak-out-against-the-conspiracy-to-impose-reckless-and-arbitrary-prohibition-against-conventional-pest-control-products-2014-11-14/>



Introduction

As long as I've been involved in federal regulatory issues (since 1990), regulators have used JUNK EPIDEMIOLOGY to JUSTIFY OVER-REGULATION.

For the first time ever, we have an administration that is committed to stopping OVER-REGULATION.

So JunkScience.com petitioned the Trump administration today to stop the MISUSE AND ABUSE OF EPIDEMIOLOGY by issuing EPIDEMIOLOGIC STANDARDS for federal agencies.

The petition is below.

Steve Milloy

Founder & publisher of the web-site called JunkScience.com

February 20, 2018

**President Donald J. Trump
The White House
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500**

**Re : Petition For Federal Standards To Stop Over-Regulation
Based On Junk Epidemiology**

Dear President Trump,

I am submitting this petition under the First Amendment right to petition the federal government to redress grievances.

I request that you issue EXECUTIVE BRANCH-WIDE STANDARDS for the use of EPIDEMIOLOGY STUDIES by regulatory agencies.

An alternative request is that you DIRECT REGULATORY AGENCIES to issue their own such STANDARDS via public notice and comment.

Pending the issuance of such standards, regulatory agencies should be ordered to suspend all use of EPIDEMIOLOGY STUDIES pending review under the new standards.

This petition is consistent with your initiative to REDUCE OVER-REGULATION that hurts the economy without providing commensurate or even any benefit.

Just one example of the significance of the problem of JUNK EPIDEMIOLOGY is President Obama's key War-On-Coal Regulations issued by the U.S. Environmental Protection Agency (EPA).

As you know, these rules were responsible for destroying about 94 per cent of the market value of the Coal Industry and killing many thousands of Coal Industry jobs during the period 2011-2016 without providing any health, environmental or economic benefits whatsoever.

The rules in question were « *justified* » on the basis of about \$600 million worth of EPA-funded EPIDEMIOLOGIC STUDIES.

These studies relied on SECRET DATA, and were either POORLY OR EVEN FRAUDULENTLY CONDUCTED AND REVIEWED.

You justifiably complain about « *fake news* ». This petition would go a long way toward preventing the « *fake news* » that has been unjustifiably harming our economy and standard of living for decades.



Petition To President Donald J. Trump For Federal Standards To Stop Over-Regulation Based On Junk Epidemiology

Background

EPIDEMIOLOGY is the statistical study of the incidence of disease in human populations.

Importantly, EPIDEMIOLOGY is merely a branch of statistics; it is NOT science.

EPIDEMIOLOGY DOES NOT provide biological or medical explanations (i.e., physical plausibility) for its purported results.

EPIDEMIOLOGY's statistical nature is most useful when looking for high rates of rare disease in a population.

The classic examples of properly applied EPIDEMIOLOGY are food poisoning incidents and the link between heavy smoking and lung cancer.

Unfortunately, however, over-zealous regulatory agencies have been DISREGARDING THE LIMITATIONS OF EPIDEMIOLOGY for almost 30 years.

They often pretend that EPIDEMIOLOGY is a complete science, NOT merely statistics.

They often IMPROPERLY USE EPIDEMIOLOGY to study low rates of common diseases.

The data used in EPIDEMIOLOGY STUDIES is often of such POOR QUALITY that epidemiologists REFUSE TO SHARE THEIR DATA with independent researchers for purposes of replicating and verifying results, a tradition fundamental to the scientific method.

In the case of EPA's War-On-Coal Rules, EPA-funded researchers have been HIDING DATA from public review for more than 20 years — even defying the request of EPA's own statutorily mandated science advisory board and Congressional subpoena for the data.

The ABUSE OF EPIDEMIOLOGY by federal regulatory agencies can be exemplified to laymen by comparing the number of deaths attributed to smoking against the number of deaths attributed to blue-sky clean air.

The Department of Health and Human Services claims that smoking kills about 440,000 people per year.

But the Obama EPA claimed that fine particulate matter (soot and dust called « $PM_{2.5}$ ») in everyday blue-sky outdoor air kills 570,000 per year.

So, smoking kills 440,000 while blue-sky outdoor air kills almost 30 per cent more on an annual basis !?!?

One can easily understand why the EPA-funded epidemiologists have been HIDING THEIR DATA for 20-plus years.

Petition To President Donald J. Trump For Federal Standards To Stop Over-Regulation Based On Junk Epidemiology

Current Epidemiologic Standards In The Federal Government

The first effort to issue standards for interpreting EPIDEMIOLOGY STUDIES was articulated by famed British Epidemiologist Sir Austin Bradford Hill in 1965.

Hill almost uncannily foresaw the most common ABUSE OF EPIDEMIOLOGY we see today — i.e., INAPPROPRIATE RELIANCE ON WEAK STATISTICAL CORRELATIONS (also called « *weak associations* ») that likely reflect only POOR DATA QUALITY OR CHANCE, versus meaningful results.

The adage « *correlation is not causation* » should come to mind here.

Not only is the adage true, but also WEAK CORRELATIONS (or WEAK ASSOCIATIONS) never portend causation.

Weak associations are just meaningless, statistical noise.

There is NOT a single example in the scientific literature of a WEAK ASSOCIATION EPIDEMIOLOGY STUDY whose reported association turned out to be scientifically valid.

The Obama EPA used this STATISTICAL NOISE to unjustifiably wreak havoc on the Coal Industry.

While Hill's criteria do appear in some agency guidance documents concerning the use and interpretation of EPIDEMIOLOGY, they uniformly omit Hill's warning about the UNRELIABILITY OF WEAK ASSOCIATIONS.

As a consequence, regulatory-happy federal agencies often disregard Hill's standards and MIS-INTERPRET STATISTICAL NOISE as cause-and-effect relationships in order to justify their (over)regulatory agendas.

Though the federal courts have received some GUIDANCE on the interpretation of EPIDEMIOLOGY from the National Academy of Sciences and an international standards group (Grading of Recommendations Assessment, Development and Evaluation or «*GRADE* ») has issued some standards for interpreting EPIDEMIOLOGY STUDIES, federal regulatory agencies have remained oblivious and their MISUSE AND ABUSE OF EPIDEMIOLOGY is ongoing.

Congress has also tried to rein in the ABUSE OF EPIDEMIOLOGY.

The House-passed HONEST Act would require that EPIDEMIOLOGIC DATA relied on by EPA be MADE AVAILABLE TO THE PUBLIC for purposes of verification and study replication.

Although the bill has passed the past three House sessions, it has been stranded in a Senate that requires 60 votes to pass a bill.



Petition To President Donald J. Trump For Federal Standards To Stop Over-Regulation Based On Junk Epidemiology

The Lack Of Epidemiology Standards Threatens Efforts To Reduce Over-Regulation

It is a safe bet that virtually all EPIDEMIOLOGY-based federal regulatory efforts over the past 25 years or so may be considered as « *fake science* » or « *junk science* ».

This is because federal agencies, especially the EPA, have taken actions or issued warnings or regulations based on the STATISTICAL NOISE that is WEAK ASSOCIATION EPIDEMIOLOGY.

This « *fake science* » should be held up to NEW ROBUST FEDERAL EPIDEMIOLOGY STANDARDS, and then validated or discarded based on its actual merits.

Otherwise, any de-regulatory agenda is at severe risk of failure or roll-back.

Consider the EPA's proposed repeal of the Obama War-On-Coal rule known as the Clean Power Plan (CPP).

Although the CPP is ostensibly a rule addressing greenhouse gas emissions, the Obama EPA actually justified the rule on the basis that reduced coal plant greenhouse gas emissions would necessarily mean reduced emissions of the afore-mentioned PM_{2.5} from coal plants.

As the Obama EPA had determined (BY SECRET SCIENCE-BASED WEAK ASSOCIATION EPIDEMIOLOGY) that PM_{2.5} was associated with thousands of premature deaths annually (each valued by EPA via JUNK ECONOMICS at about \$9 million), the CPP was «*determined*» by the Obama EPA to provide billions of dollars in benefits annually — an IMAGINARY AMOUNT OF BENEFITS that far exceeded the actual multi-billion estimated compliance costs of the CPP.

The Trump EPA has proposed to REPEAL the Clean Power Plan (CPP) the basis that PM_{2.5} CAUSES NO DEATHS at current levels — essentially IGNORING THE FAKE SCIENCE of previous EPAs on PM_{2.5} .

This more realistic view of PM_{2.5} reduced the CPP's ESTIMATED AND IMAGINARY BENEFITS to well below its actual compliance costs.

Reducing the Over-Regulation of all the PM_{2.5}-dependent War-On-Coal Rules — including the Cross-State Air Pollution Rule and Mercury Air Transport Standard (MATS) — requires a review of the PM_{2.5} EPIDEMIOLOGY under new standards.

The Obama EPA's onerous and benefit-less ozone air quality standards also depend on the PM_{2.5} FAKE SCIENCE.

It would be possible to reduce that rule's EXPENSIVE AND POINTLESS OVER-REGULATION by reviewing its underlying science under sound principles and standards for EPIDEMIOLOGY.



Conclusion

EPIDEMIOLOGY has been GROSSLY ABUSED by regulators and university researchers for so long, the vast majority of epidemiologists NO LONGER CARE whether their work is charitably described as « *GARBAGE-IN, GARBAGE-OUT* ».

That situation may be fine for AGENDA-DRIVEN REGULATORS and their GRANT-HUNGRY UNIVERSITY EPIDEMIOLOGISTS, but it is a terribly DESTRUCTIVE SITUATION for the economy, tax-payers and science.

I am happy to answer any questions you may have.

Sincerely,

Steve Milloy, MHS, JD, LLM
Publisher
Trump EPA Transition Team member



Juris Dr Steven J Milloy

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National Organization Responding Against HHS that conspire to destroy the Great State and other Americans (NORA)



Background Information

Juris Dr Steven J Milloy's Biography

Steven J Milloy is a Juris Doctor and a leading policy expert on the subject of regulatory affairs and pest control products.

Dr Milloy is among several highly-rated leading experts who have recognized expertise, training, and background in matters concerning pest control products, and who promote environmental realism and pesticide truths.
<http://wp.me/p1jq40-8DV>

He is also the founder and publisher of the web-site called *JunkScience.com*, the senior legal fellow at the *Energy & Environment Legal Institute*, and the author of *Scare Pollution : Why and How to Fix the EPA*.

Dr Milloy also served on the Trump EPA transition team.

He has also been the president of *Citizens for the Integrity of Science*, a long-time columnist for *FoxNews.com*, and the co-founder & portfolio manager of the *Free Enterprise Action Fund*, the first conservative/libertarian mutual fund.

Juris Dr Milloy earned a B.A. in Natural Sciences from the *Johns Hopkins University*, a Master of Health Sciences in Biostatistics from the *Johns Hopkins University School of Hygiene and Public Health*, a Juris Doctorate from the *University of Baltimore*, and a Master of Laws from the *Georgetown University Law Center*.

As one of the most effective and consistent spokesmen on the subject of public policy and pest control products, Juris Dr Milloy has effectively and consistently spoken out against fanatical-activists and their anti-pesticide prohibitions on a very frequent basis.

Dr Milloy SPEAKS THE TRUTH — and deserves CONGRATULATION.

The Wisdom of a REAL Expert

The Whole Truth From DR MILLOY Can Be Explored On The Pesticide Truths Web-Site ...

MILLOY — THE MEDIA LIBRARY OF MILLOY (Web-Page)

<http://pesticidetruths.com/2017/07/02/u-s-a-the-era-of-trump-dismantling-the-alarmism-industry-the-end-of-u-s-agencies-reigns-of-terr%b6r-environmental-protection-agency-epa-drain-the-swamp/>

MILLOY — END OF EPA REIGN OF TERROR (Report)

<http://pesticidetruths.com/2017/07/02/u-s-a-the-era-of-trump-dismantling-the-alarmism-industry-the-end-of-u-s-agencies-reigns-of-terr%b6r-environmental-protection-agency-epa-drain-the-swamp/>

MILLOY — RACHEL CARSON WAS A LYING FEMALE JACKAL — LOATHSOME DDT OPPONENTS RAISE THEIR UGLY HEADS (Report)

<http://pesticidetruths.com/2014/05/13/rachel-carson-was-a-lying-female-jackal-loathsome-ddt-opponents-raise-their-ugly-heads-steven-j-milloy-2014-05-11/>

MILLOY — NO CREDIBLE EVIDENCE AGAINST DDT INSECTICIDE (Report)

<http://pesticidetruths.com/wp-content/uploads/2011/12/Force-Of-Nature-The-Wisdom-of-Drysdale-2011-06-12-DDT-NO-Credible-Evidence-Milloy-pdf-300-dpi.pdf>

MILLOY — DIABETES, CANCER, & INFANT DEATHS (Report)

<http://pesticidetruths.com/wp-content/uploads/2011/11/Force-Of-Nature-DDT-and-Politicized-Science-2011-05-19-Wisdom-of-Milloy-Diabetes-Cancer-Infant-Deaths-pdf-300-dpi2.pdf>

MILLOY — MERCURY NOT TOXIC TO ANYONE (Report)

<http://pesticidetruths.com/wp-content/uploads/2012/01/Force-Of-Nature-Golf-2011-03-17-Collision-Course-Mercury-History-of-Fungicides-Milloy-pdf-300-dpi.pdf>

REAL EXPERTS — EXPERTS WHO SPEAK OUT AGAINST PROHIBITION (Blog)

<http://pesticidetruths.com/2014/11/14/the-wisdom-of-real-experts-who-speak-out-against-the-conspiracy-to-impose-reckless-and-arbitrary-prohibition-against-conventional-pest-control-products-2014-11-14/>

DDT — OUR WORLD OF POLITICIZED SCIENCE (Web-Page)

<http://pesticidetruths.com/toc/ddt-and-our-world-politicized-science/>





Background Information

Epidemiology Studies Are Worthless

FORCE OF NATURE | DARING TO DEFY BUREAUCRACY | THE VOICE OF TRUTH FROM AN INDEPENDENT, BIPARTISAN
National Organization Responding Against Unethical Practices by the Government and other Industries | FORAHO

Pest control products are **SCIENTIFICALLY SAFE**, and there is **NO SCIENTIFIC BASIS FOR PESTICIDE BANS**.

So-called **REAL WORLD EPIDEMIOLOGICAL STUDIES** are **SO OFTEN WRONG** that they are coming close to being **WORTHLESS**.

If a conventional pest control product actually caused cancer, it is fairly certain that this would be ascertained through the extensive testing procedures required before it is registered for use.

The idea that there is an epidemic of human cancer caused by synthetic industrial chemicals is **NOT SUPPORTED BY EITHER TOXICOLOGY OR SO-CALLED REAL WORLD EPIDEMIOLOGY**.

EPIDEMIOLOGY is the study of the causes, distribution, and control of health problems in populations.

EPIDEMIOLOGY STUDIES cannot be relied upon ALONE, and must be backed-up with ANIMAL TOXICITY STUDIES.

The MOST USEFUL AND RELEVANT EPIDEMIOLOGY STUDIES are those that properly characterize exposure in the specific context of how the product is used.

Thus, reliance on EPIDEMIOLOGY STUDIES in regulatory decision-making is challenging in the absence of a direct-measure-of-exposure.

EPIDEMIOLOGY STUDIES tend to make use of surrogate or indirect measures for pest control product exposure (e.g., area treated, amount used, amount purchased), which can lead to UNRELIABLE ESTIMATES OF THE RISK.

EPIDEMIOLOGY STUDIES THAT IDENTIFY POTENTIAL ASSOCIATIONS MUST BE EXAMINED WITH WELL-CONDUCTED ANIMAL TOXICITY STUDIES that are specifically designed to elicit toxic effects over a series of dose levels.

These ANIMAL TOXICITY STUDIES are assessed to determine if there is any biological basis for the POTENTIAL ASSOCIATIONS noted in EPIDEMIOLOGY STUDIES.

The examination of ANIMAL TOXICITY STUDIES from internationally-accepted guideline studies using doses well-above those to which humans are typically exposed, combined with exposure data obtained from well-designed studies, is currently a useful methodology available for assessing risks to human health.

Health Canada's Pest Management Regulatory Agency (PMRA) undertakes this kind of ASSESSMENT to SUPPLEMENT INFORMATION about POTENTIAL ASSOCIATIONS that may be established by EPIDEMIOLOGY STUDIES.

This approach is consistent with that of other regulatory authorities that base human health risk assessments on ANIMAL TOXICITY DATA.

Please explore the following link ...

The Media Library On Epidemiology

<http://pesticidetruths.com/epidemiology-studies/>

The Wisdom Of Juris Dr Steven J Milloy

Norah
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All good experts must never come to an end

FORCE OF NATURE | DARING TO DEFY BY EXPLORING THE WHOLE TRUTH FROM AN INDEPENDENT PERSPECTIVE
National Organization Responding Against HWE that conspire to destroy the Green space and other industries (NORAHG)

We Speak The Whole Truth With The Wisdom Of REAL Experts Like Dr Steven J Milloy

We are the [National Organization Responding Against HUJE](#) that conspire to destroy the Green space & other industries ([NORAHG](#)).

NORAHG is a non-profit & independent organization that reports on the work of several highly-rated leading experts who have recognized expertise, training, & background in matters concerning pest control products, & who promote environmental realism & pesticide truths.

NORAHG produces *A Look At ...*, a series of reports & blogs providing PRACTICAL INFORMATION on issues such as *Career Management, Golf Course Maintenance, Green Alternatives, Lawn Care Maintenance, Summer Stress, Tree & Shrub Maintenance, Turfgrass Pests, & Turfgrass Species*.

A Look At ... is destined for the green space industry, nation-wide across Canada, the United States, & overseas, & can be found on *The Pesticide Truths Web-Site ...* <http://pesticidetruths.com/>

A Look At ... is committed to SOUND SCIENCE, as well as ground breaking original reporting that informs, entertains, & creates real change.

All information, excerpts, & pictures contained in *A Look At ...* were retrieved from the Internet, & may be considered in the public domain.

The information presented in *A Look At ...* is for preliminary planning.

Before making a final decision, the turf manager is expected to obtain trusted expert advice from extension specialists, local distributors and/or agronomists.

All decisions must take into account the prevailing growing conditions, the time of year, & the established management practices.

All products mentioned in *A Look At ...* should be used in accordance with the manufacturer's directions, & according to provincial, state, or federal law.

For the official advantages, benefits, features, precautions, & restrictions concerning any product, the turf manager must rely only on the information furnished by the manufacturer.

The mention of trade names does not constitute a guarantee or a warranty.

NORAHG also produces *Force Of Nature*, which dares to defy the pesticide-hating fanatics by exploring the whole truth from an independent perspective on *The Pesticide Truths Web-Site* ... <http://pesticidetruths.com/>

A Look At ... Force Of Nature, & their various incarnations, was the brain-child of William H Gathercole (now retired) & his colleagues.

Here is a brief summary of Mr Gathercole's career —

FIELDS OF STUDY — Horticulture/Agriculture • Mathematics • Physics.

ALMA MATER — McGill University • University of Guelph • the first person ever to obtain university degrees & contribute to both the professional lawn care & golf maintenance industries.

EXPERTISE IN — turf & ornamental maintenance & troubleshooting • history of the green space industry • sales & distribution of seeds, chemicals, fertilizers, & equipment • fertilizer manufacturing & distribution • environmental issues & anti-pesticide terrorism.

NOTABLE ACTIVITIES — worked in virtually all aspects of the green space industry, including golf maintenance, professional lawn care, tree & shrub care, distribution, environmental compliance, government negotiations, public affairs, & workplace safety — • the supervisor, consultant, & programmer for the successful execution of hundreds-of-thousands of management operations in the golf course & urban landscape, as well as millions of pest control applications • the advisor, instructor, & trainer for thousands of turf & ornamental managers & technicians • the pesticide certification instructor for thousands of industry workers • a founder of the modern professional lawn care industry • the prolific writer for industry publications, reports, & blogs • the first to confirm the invasion of *European Chafer* insects in both the Montreal region & the Vancouver / Fraser Valley region • with Dr Peter Dernoeden, the first to confirm the presence of *Take All Patch* as a disease of turf in Eastern Canada • with Dr David Shetlar, the first to confirm the presence of *Kentucky Bluegrass Scale* as an insect pest in South-Western Ontario, & later, in the Montreal & Vancouver regions.

SPECIAL CONTRIBUTIONS — the creator of the *Exception Status* that allowed the golf industry to avoid being subjected to anti-pesticide prohibition for a generation • the creator of the signs that are now used for posting after application • the co-

founder of annual winter convention for Quebec golf course superintendents • the co-founder of the first ever *Turf Summit* • the major influence in the decision by *Canadian Cancer Society* to stop selling-for-profit fresh pesticide-treated daffodils • the only true reliable witness of the events of anti-pesticide prohibition in the town of *Hudson, Quebec* • the founder (now retired) of *A Look At ... & Force Of Nature* reports & blogs.

NOTABLE AWARD — the first man-of-the-year for contributions leading to the successful founding of the Quebec professional lawn care industry, which served as a beach-head against anti-pesticide activists in the 1980s & 1990s.

LEGACY — Mr Gathercole & his colleagues ... designed & implemented strategies that reined anti-pesticide activists & provided peace & prosperity for the entire modern green space industry across Canada for a generation • orchestrated legal action against anti-pesticide activists in the town of *Hudson, Quebec* • launched the largest founding professional lawn care business in the nation • quadrupled the business revenues of one of the largest suppliers in the nation.

Mr Gathercole is now retired, although his name continues to appear as the founder of *A Look At ... & Force Of Nature* reports & blogs.

We dare to defy by exploring the whole truth from an independent perspective on *The Pesticide Truths Web-Site* ... <http://pesticidetruths.com/>

If you wish to receive free reports & blogs on issues that concern you, please contact us at ... force.of.de.nature@gmail.com WILLIAM H GATHERCOLE AND NORAH G



The Path To Knowledge

Steven J Milloy

The Wisdom Of
A REAL Expert

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