

August 26, 2022

James L. Madara, MD
Chief Executive Officer and Executive Vice President
American Medical Association
330 N Wabash Avenue NO 39300
Chicago, IL 60611-5885

Dear Dr. Madara:

As the President and CEO of the American Gas Association (AGA), which represents more than 200 natural gas utilities that deliver essential energy to 187 million Americans and 5.5 million businesses every day, I can confirm that the industry's highest priority is the safety of our customers, communities, and employees. The natural gas industry delivers life-sustaining energy reliably and safely on both the coldest and hottest days of the year, and the increased use of natural gas has been the single-largest contributor to the U.S. lowering its greenhouse gas emissions to more than 30-year lows. According to an analysis released by the U.S. Department of Energy in March, natural gas is 3.4 times more affordable than any other energy source for providing vital fuel for heating and cooking to Americans, including the most vulnerable populations. In fact, the National Bureau of Economic Research found that 11,000 lives are [saved](#) during the winter due to the lower price of natural gas for heating.

With that background, AGA is quite concerned about the incomplete and inadequate scientific basis of the American Medical Association House of Delegates [Resolution 439](#), "Informing Physicians, Health Care Providers, and the Public that Cooking with a Gas Stove Increases Household Air Pollution and the Risk of Childhood Asthma." Reference Committee D drafted and recommended for approval this resolution at the Annual Meeting of the House of Delegates in June 2022.

We recommend that the AMA House of Delegates and Reference Committee D should closely re-examine the basis for and approval of Resolution 439.

The resolution presumes an unsubstantiated causal relationship between gas-fired cooking and childhood asthma based on an uncritical review of a limited and biased selection of the scientific literature. The conclusion of the resolution conflicts with observations in childhood asthma literature and is unsupported by actions from the regulatory agencies and organizations responsible for protecting residential consumer health and safety. The Federal Interagency Committee on Indoor Air Quality (CIAQ), which is comprised of two dozen federal agencies led by the U.S. Environmental Protection Agency (EPA), routinely addresses indoor air quality issues of public importance. The CIAQ has not identified natural gas cooking emissions as a concern related to asthma or respiratory illness. AGA commissioned a third-party, Gradient, to review the studies cited in support of the resolution. Gradient "is an environmental and risk sciences consulting firm renowned for our specialties in Toxicology, Epidemiology, Risk Assessment, Product Safety, Contaminant Fate and Transport, Industrial Hygiene, Geographic Information Systems, and Environmental/Forensic Chemistry." Gradient's stated [purpose](#) is to "provide cutting edge risk sciences consulting service that advance science, help governments develop

sound risk policies and answer the most difficult health effects questions.” Their analysis, attached to this cover letter, identifies significant deficiencies in the supporting studies.

Gradient concluded that “the available studies do not provide a reliable scientific basis for AMA to make causal inferences regarding the relationship between the use of gas-fired residential cooking appliances and childhood asthma.” (See Gradient analysis attached.)

The resolution’s recommendation to switch to electric cooking is also unsupported by any substantive evidence that electric cooking is cleaner when cooking byproducts are considered. Indoor air quality studies have consistently found that emissions from the cooking process—not solely from the burner or heat source operation—represent the chief concern for indoor air quality. Switching to electrical appliances is not an effective strategy to address indoor air quality because the emissions of concern are dominated by the smoke and grease from cooking, regardless of the energy source used in conventional residential appliances.

As stated previously, the natural gas utility industry is fully committed to the health and safety of our customers and to reducing emissions. As concerns over emissions from gas ranges are raised and debated, the natural gas industry is focused on bringing objective technical information to the discussion. In collaboration with research organizations, AGA and appliance manufacturers continue to develop information and educate consumers, employees, and regulators about the safety of natural gas cooking appliances and ways to reduce cooking process or combustion emissions such as ventilation. These groups are heavily engaged in promoting the safe use of natural gas appliances through the development of standards for the design of natural gas appliances, participating in building safety codes and standards proceedings, and federal agency reviews.

Doctors, like energy utilities, are vital and trusted members of the communities in which we serve. This resolution, which suggests doctors take actions based on incomplete analysis of existing scientific literature, does not appear to hold up to the level of accountability that science and the AMA Code of Medical Ethics require.

Please share this letter and accompanying Gradient analysis with the members of the Reference Committee D listed below. We look forward to your review of this analysis and response.

Sincerely,



cc: House of Delegates, Reference Committee D

Ankush K. Bansal, MD
Florida Medical Association
Chair, Reference Committee D
American Medical Association

Jade A. Anderson
Resident and Fellows Section, AMA

Nicolas Argy, MD, J.D.
Massachusetts Medical Society

Man-Kit Leung, MD
California Medical Association

Jean R. Hausheer, MD, FACS
Oklahoma State Medical Association

Laurel Ries, MD (Alternate)
Minnesota Medical Association

Sherif Z. Zaafran (Alternate)
Texas Medical Association