USDA, Food and Nutrition Service, Center for Nutrition Policy and Promotion Comments on the Interagency Science Consultation Draft IRIS Toxicological Review of Inorganic Arsenic November 2022

(Date Received December 21, 2022)

- The systematic review protocol for the Inorganic Arsenic IRIS Assessment was implemented in a rigorous and highly transparent way.
- Arsenic studies are scientifically justified and clearly described, considering the
 important methodological features of the assessed outcomes. Risk of bias was assessed
 using a robust methodology, and overall study ratings were clearly displayed and
 accounted for in the interpretation of the evidence e.g., conclusions focus on evidence
 from medium or high confidence and the effect potential bias in individual studies may
 have on health effects was taken into account in each synthesis.
- Presentation and analysis of study results is clear. Synthesis of evidence from human
 epidemiological studies support strength of evidence judgements. Judgements are
 transparent and accurately reflects risk of bias, study sensitivity, consistency, magnitude
 of effect and dose response evidence outlined in the report.