

1 p. 200.5. The Faroe Islands study suffered from incomplete follow-up by: (1) failing to
2 collect prenatal PCBs and DDT from umbilical cord blood, (2) failing to test for postnatal
3 exposure to methylmercury, PCBs, and DDT, and (3) failing to publish neuropsychological
4 data from the 14-year-old cohort. Murray, 10 Tr. 1167:16-1168:15; 10 Tr. 1228:22-28;
5 10 Tr. 1239:24-1231:1.

6 105. The average daily exposure to PCBs among Faroese women exceeds the
7 United States reference dose (“RfD”) for PCBs by 172 times, and the average daily exposure
8 to methylmercury exceeds the RfD for methylmercury by four times. Murray, 10 Tr.
9 1216:21-1218:27; 10 Tr. 1221:1-11; TX 821. Despite these higher exposure levels, the
10 Faroe Islands researchers never measured the prenatal PCB exposure for approximately half
11 of the children. Murray, 10 Tr. 1228:22-25; TX 796, p. 3. The Faroe investigators also
12 failed to document and analyze the amount of methylmercury, PCBs, and DDT that the
13 children were exposed to postnatally by either their mother’s milk or by eating whale after
14 they were weaned. Murray, 10 Tr. 1169:18-1170:2; 10 Tr. 1223:20-23; 10 Tr. 1241:15-25.
15 If a child is exposed prenatally to both methylmercury and PCBs, and proper exposure
16 measurements are not made of both chemicals, it is impossible to determine what chemical
17 caused the poor results on the Boston Naming Test. Murray, 10 Tr. 1228:2-10; TX 796, p. 3.

18 **4. The Faroe Islands Study Does Not Adequately Identify or**
19 **Quantify Biases and Confounding Factors**

20 106. An appropriate epidemiologic study for use under Proposition 65 must
21 identify and quantify all biases and confounding factors. Murray, 10 Tr. 1168:16-1169:3;
22 TX 2, p. 200.5. A bias is any factor that consistently changes the results in one direction of
23 the study. Murray, 10 Tr. 1170:4-7. A confounding factor is “a factor that is associated both
24 with the chemical that is being studied and the endpoint that is being studied ... it’s
25 something that can explain the results of the study other than the chemical that was originally
26 being studied.” Murray, 10 Tr. 1171:8-13. The Faroe investigators failed to identify and
27 quantify the bias and confounding factors that could overestimate the effects of
28 methylmercury mercury in their data.