REPORT OF ANNE MCTIERNAN, M.D., PH.D. TO THE HOUSE OF REPRESENTATIVES SUBCOMMITTEE ON ECONOMIC AND CONSUMER POLICY March 12, 2019

Chairman Krishnamoorthi, Ranking Member Cloud, and members of the subcommittee, good morning and thank you for inviting me. My name is Dr. Anne McTiernan. I am a cancer prevention researcher in the Epidemiology Program, Division of Public Health Sciences, at the Fred Hutchinson Cancer Research Center in Seattle, Washington. I am also a Research Professor in the University of Washington Schools of Public Health and Medicine. I am not representing the Fred Hutchinson Cancer Research Center or the University of Washington in the presentation of my testimony to the Subcommittee. I am an internal medicine physician and epidemiologist. My research focuses on cancer epidemiology and prevention, particularly cancers in women. I was asked to give testimony today because I have conducted a thorough and systematic review of the science linking use of talcum powder products and risk for ovarian cancer which I am incorporating in my written statement.

The Committee should be aware that I have been retained by plaintiffs in the matter of *In Re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation* to review the current state of the scientific literature regarding talcum powder products and opine on whether those products cause ovarian cancer. When I refer to talc or talcum powder products in this report, I am referring to commercially available talcum powder products and all constituent elements contained within. I have not previously provided expert testimony in legal cases.

Credentials, Expertise, and Experience

I am a Full Member at the Fred Hutchinson Cancer Research Center in Seattle, Washington, Division of Public Health Sciences, Program in Epidemiology. I am also a Full Research Professor at the University of Washington School of Public Health, Department of Epidemiology, and the University of Washington School of Medicine, Department of Medicine, Division of Geriatrics. I am an elected member of the American College of Epidemiology, the Obesity Society, and the American College of Sports Medicine. From 2002-2012, I directed the Fred Hutchinson Cancer Research Center's Prevention Center.

I have received several prestigious awards for my research work including: the American College of Sports Medicine Wolffe Lecture, 2018, the American College of Sports Medicine Citation Award, 2012; the McDougall Mentoring Award, Fred Hutchinson Cancer Research Center, 2011; Komen for the Cure Scientific Advisory Council/Komen Scholars, 2010-2012; the University of Washington Roger E. Moe Award for Translational Research 2009; and the Joan P. Liman MD Award, Recipient, New York Medical College, 1989.

I received my PhD in Epidemiology in 1982 from the University of Washington, and my MD degree in 1989 from New York Medical College. I completed Internal Medicine residency training from the University of Washington in 1992. For the past 25 years, I have focused on epidemiologic research, primarily in cancer and women's health. My research studies used the methodology employed in the talcum powder products and ovarian cancer studies, namely, case-control studies, cohort studies, and meta-analyses. In addition, I have had leadership positions for several randomized controlled trials testing interventions to prevent cancer. I have published over 400 scientific manuscripts in peer-reviewed medical and scientific journals, have contributed to several academic texts, and have edited two academic texts.

I have held several leadership positions in scientific U.S. Government work. Most recently, I was a member of the 2018 U.S. Department of Health and Human Services Physical Activity Guidelines Advisory Committee and was a member of the 2008 U.S. Department of Health and Human Services Physical Activity Guidelines Advisory Committee. I served as chair of the Cancer subcommittees for both Committees. I have served on, or chaired, grant review panels for the U.S. Department of Defense Congressionally Directed Medical Research Programs and the National Institutes of Health, and

serve as a program reviewer for NCI intramural epidemiologic research branches and for NCI comprehensive cancer centers.

I have served on editorial boards for the American Association for Cancer Research Cancer Prevention Journal, the Journal of Women's Health, and Medscape Women's Health. I have reviewed manuscripts for over a dozen prestigious journals including: JAMA, Journal of the National Cancer Society, Archives of Internal Medicine, American Journal of Epidemiology, Annals of Internal Medicine, European Journal of Cancer, British Journal of Cancer, Cancer Causes & Control, Cancer Epidemiology Biomarkers & Prevention, Annals of Epidemiology, Epidemiology, and Nutrition.

My research funding has been provided by the U.S. National Cancer Institute, the National Institutes of Health, the National Heart Lung & Blood Institute, Komen for the Cure, the Breast Cancer Research Foundation, National Cancer Institute Canada, and various pharmaceutical companies and other foundations. I have been Principal Investigator of several randomized clinical trials testing effects of various agents in relation to prevention of breast and other cancers, including exemestane, raloxifene, tamoxifen, aspirin, and vitamin D. In addition, I have been Principal Investigator of four randomized clinical trials testing effects of weight loss and exercise on biomarkers of breast and other cancers. I am co-investigator of a pending National Cancer Institute funded trial testing the effect of exercise on quality of life in women with ovarian cancer. I was Principal Investigator of the Seattle site of a prospective cohort study of 1100 breast cancer survivors that investigated associations of hormones, inflammation, diet, exercise, obesity, and breast cancer survival. I was Principal Investigator of a case-control study of thyroid cancer and hormones in women, and co-investigator of a case-control study of breast cancer in men. I have published on data from other case-control studies including studies on breast cancer, pituitary tumors, melanoma, and colorectal adenomas. I have collaborated in several prospective cohort studies, resulting in lead, senior, and co-authorship of several epidemiologic manuscripts. These included the Women's Health Initiative Observational Study, the Tromso study, the Carotene and Retinol Efficacy Trial cohort, the VITAL cohort, and the Pancreatic Cancer Cohort Consortium.

While my major focus is in epidemiology of breast cancer, I have also published on ovarian cancer, on gynecologic cancers in general, and on women's cancers, as described below, as well as on colorectal, pancreas, melanoma, and prostate cancers. In my randomized clinical trials and prospective cohort studies, I have investigated the effects of weight loss and exercise on biomarkers of inflammation, which is highly relevant to the topic of this report, because inflammation may be one mechanism linking talcum powder products exposure and risk of ovarian cancer.

My international work in epidemiology has included work with the International Association for Research in Cancer (IARC), the World Cancer Research Fund, and the Norwegian Tromso and EBBA studies. For IARC, I chaired a working group on mechanisms for a monograph on obesity, physical activity, and cancer risk (IARC Handbook of Cancer Prevention 2002: Physical Activity and Weight Control, 2000-1). For the World Cancer Research Fund, I am a member of the advisory panel of experts that guides interpretation of meta-analyses and systematic reviews of nutrition, physical activity, obesity, and risk for many cancers including ovarian cancer (http://wcrf.org/sites/default/files/Ovarian-Cancer-2014-Report.pdf).

From 1992 to 1997, I was the Project Director for clinical work at the Women's Health Initiative Clinical Coordinating Center. I held this role from the inception of the Women's Health Initiative, and therefore directed all aspects of development and implementation of the three clinical trials and observational study. This included development of questionnaires and protocols. Of interest to ovarian cancer and talcum powder products, one of the Women's Health Initiative questionnaires includes questions about use of talcum powder products. Furthermore, ovarian cancer was one of the primary cancers included as an outcome in this study. As Project Director, I oversaw development of the protocol and procedures for ascertainment and adjudication of cancer outcomes, including ovarian cancer. When I stepped down as Project Director (to lead my own National Cancer Institute funded studies), I retained leadership of the outcomes work for the Women's Health Initiative through 2005. This outcomes work entailed identifying cases of specific diseases such as cancer (including ovarian), collecting medical records, and classifying cases according to standardized criteria.

Although I have not personally conducted research on talcum powder products use and risk for ovarian cancer, I have published several manuscripts on gynecologic cancers, including prevention of ovarian cancer in women at high genetic risk, as well as effects of weight and exercise on risk for ovarian cancer and on survivorship in ovarian cancer patients. In addition, I am co-investigator of a National Cancer Institute grant to test an exercise intervention on quality of life in women with ovarian cancer.

While my expertise is in the area of epidemiology, primarily in women's health and cancer research, I regularly consider the reports and studies from different scientific and medical fields including pathology, oncology, gynecology, physiology, molecular biology, and toxicology, and therefore, I have experience and expertise to consider evidence presented by experts in these fields, as I do when I prepare scientific manuscripts and grant proposals, when I review grants and manuscripts for government and private funding agencies, and when I do peer-reviewing for scientific and medical journals.

Overall Approach

The foundation for this report is based upon my education, expertise, and years of experience in designing, conducting, and interpreting epidemiologic studies, as well as my medical training. I drew upon my years of experience with synthesizing and interpreting large numbers of epidemiologic studies for comprehensive reports including work for the U.S. government, the World Health Organization International Agency for Research on Cancer (IARC), and the World Cancer Research Fund. My opinions are based on the published epidemiologic evidence including original case-control and cohort studies, systematic reviews, meta-analyses, and pooled analyses on the topic of talcum powder products exposure and risk of ovarian cancer. In reviewing the epidemiologic literature, I used my experience as a researcher in evaluating study quality, and in determining evidence of association between talcum powder products and ovarian cancer in terms of estimated size of the effect and statistical significance. I drew upon my 36 years as a PhD-trained epidemiologist and 26 years as an MD-trained clinical scientist.

In developing my opinions in this report, I applied the same rigor and standards as I utilize in my academic and research work. In addition to my review of epidemiologic studies, I also considered and reviewed clinical, pathological, and biologic and mechanistic evidence regarding talcum powder product exposure and ovarian cancer development.

Executive Summary

This review assessed relevant published epidemiologic evidence on the association between use of talcum powder products in the genital/perineal area and risk of developing epithelial ovarian cancer. My review, as discussed more fully in this report, included 38 publications in Medline referenced scientific journals. Of these papers, 28 presented data from case-control studies(1-28), 5 presented results from 3 cohort studies(29-33), 7 were meta-analyses of all epidemiologic studies up to a set date(11, 22, 34-38), and 1 was a pooled analysis of 8 case-control studies(39). All of these form the basis for the conclusions below. The meta-analyses, which included data summarized from all published case-control and cohort studies, consistently showed that ever use of talcum powder products in the genital/perineal area is associated with a statistically significant 22 - 31% increased risk of developing epithelial ovarian cancer overall compared with never-users. Further, the meta-analyses found a statistically significant 24 – 32% increased risk of developing serous ovarian cancer—the most common subtype of epithelial ovarian cancer—in women who had ever used talcum powder products compared with never-users. The pooled analysis, which included data from 5 previously published and 3 unpublished case-control studies, found similar statistically significant increased risks for overall epithelial ovarian cancer and serous ovarian cancer (24%). The two most recent meta-analyses, and the pooled analysis, found evidence of relationships between increasing amount of exposure to talcum powder products in the perineal/genital area (including frequency, years of use, and estimates of lifetime applications) and increased risk of developing epithelial ovarian cancer (i.e., dose-response relationships).

Published laboratory and clinical studies on talc exposure and ovarian carcinogenesis have shown that in humans, talc can migrate from the perineum to the ovaries and that it can cause an inflammatory response. Elevated levels of biomarkers of inflammation (such as cytokines), as well as oxidative stress, provide biologically plausible pathways by which talcum powder product exposure can induce neoplastic transformation and result in ovarian cancer.

Given the frequency with which asbestos, a known carcinogen has been found in cosmetic and personal-use talc products, I reviewed the literature on the epidemiology of asbestos and risk of ovarian cancer. Due to the presence of not only asbestos but fibrous talc, heavy metals, and fragrance, I also reviewed literature on the carcinogenic properties of these constituents. IARC noted in its 2012 report that a causal association between exposure to asbestos and cancer of the ovary was clearly established.(40, 41) IARC has classified asbestos and talc containing asbestiform fibers grown in an asbestiform habit as Class 1 carcinogens(40, 42). Talc fibers grown in an asbestiform habit are often referred to as "fibrous talc." The elongated features of fibrous talc have many of the carcinogenic properties of asbestos that are known to cause an inflammatory process.(40) The additional chemicals present in talcum powder products discussed above were also classified by IARC to be carcinogenic(40), contributing to the biologically plausible mechanisms to explain the carcinogenic effects of talcum powder products.

The epidemiologic evidence in total, along with the biological and pathological evidence, fits virtually all of the Bradford Hill aspects of causation(43), namely: strength, consistency across populations, temporality, biologic gradient (doseresponse), plausibility, coherence, and analogy. The weight of the evidence related to genital use of talcum powder products and ovarian cancer development demonstrates a consistent increased risk. There are many instances in which relative risks less than 1.5 are widely accepted within the scientific community as being causative and have strong public health and clinical ramifications, as I point out in the report. Given the high prevalence of use of talcum powder products (as much as half of women in some studies), a relative risk/odds ratio in the range observed in these studies can have profound effects on clinical events and public health.

In my opinion, as an epidemiologist and physician, stated to a reasonable degree of medical and scientific certainty, use of talcum powder products in the genital/perineal area can cause ovarian cancer. I base this opinion on the statistically significant elevated risk estimates (relative risk, odds ratios) seen when the epidemiologic data are combined, the pathological evidence, the consistency of results across geographic areas and in different race/ethnic groups, the evidence of a positive dose-response effect, and the plausible biological mechanisms.

The Science of Epidemiology

Epidemiology is the science of diseases in human populations. Epidemiologists study patterns of disease occurrence to determine causes of the disease of interest, with an aim of finding ways to prevent the disease from occurring. Epidemiological research describes and seeks to explain the distribution of health and disease within human populations. Its methods are based mainly on comparative observations made at the level of individuals within populations. This type of investigation is known as observational. By relating differences in circumstances and behavior to differences in the incidence of disease, associations are identified that may or may not be causal.

In epidemiological studies, an 'exposure' is a factor or condition that may or may not influence the risk of disease. For assessing effects of some exposures, epidemiologists may employ randomized controlled clinical trials, but for exposures that have possible adverse effects with little known benefit, such studies would be unethical. For example, the effects of vitamin supplements have been tested in large-scale clinical trials to determine effects on risk for several cancers. This was considered ethical because the expectation was that the vitamin supplements could have benefit, and were unlikely to have risk, for study participants. For toxicological exposures, however, with little expectation of benefit to offset possible adverse effects, observational studies will usually be the only available epidemiological evidence.

Much public health knowledge derives from epidemiological studies. For example, observational epidemiological studies show us that individuals who drink excessive amounts of alcohol have a high risk for developing liver failure and other diseases. Such studies have shown that persons with obesity have a high risk for developing diabetes and that smokers have high risk for developing lung cancer. Similarly, the effects of toxic agents on risk for several diseases have been identified through observational epidemiological studies. Examples include the effect of lead paint on cognitive development in children; the effect of radium exposure on bone health, blood abnormalities, and cancers; and the effect of second hand smoke on risk for lung cancer in nonsmokers.

The associations between talcum powder product use and risk for ovarian cancer have been studied only in two types of epidemiologic studies—case-control and cohort—and therefore this description of epidemiologic methodology below is limited to those types of studies.

Terminology in Epidemiological Studies

Disease incidence: The incidence of a disease is the number of new cases that occur. An incidence rate is the number of new cases that occur per number of persons over an interval of time. Typically, for cancer, incidence rates per 100,000 individuals per year are determined. The incidence rate for ovarian cancer in the U.S. is approximately 11.7/100,000 women/year (https://seer.cancer.gov/statfacts/html/ovary.html).

Risk: The risk of a disease refers to likelihood of its occurrence. In epidemiological studies, risk is usually used in relative terms, that is, the risk of developing cancer in one group versus the risk in another group. In cancer epidemiology, the risk almost exclusively refers to risk of incident cancer, that is, risk of a new cancer occurrence.

Risk factor: The World Health Organization defines a risk factor as any attribute, characteristic or exposure of an individual that increases the likelihood of developing a disease or injury (http://www.who.int/topics/risk_factors/en/). Risk factors can be inherent, such as sex, age, and genetics; lifestyle-related such as diet, physical activity, or smoking; health related such as menstrual factors, reproductive history, or history of infectious diseases; toxic exposures such as minerals, metals, chemicals, or radiation; or medical, such as use of particular medications.

Exposures: In epidemiological studies, an 'exposure' is a factor or condition that may increase or decrease the risk of disease. In this report, use of talcum powder products is the 'exposure' investigated. Self-reporting of exposure could result in incomplete information. Some women may over-report use of personal products, while others may not recall whether they used the products, how often or at what quantity they used them, or for how long they continued using them. Studies in which participants are queried by trained interviewers may be able to obtain information in greater detail than when participants complete questions on a form.(44) However, women may be reluctant to relay sensitive personal information to an interviewer as opposed to a self-administered form.(44) This type of systematic bias, however, would underestimate the relative risk, suggesting that effects of talcum powder product use in the perineal area may be stronger than reported in epidemiologic studies.

Association: Epidemiologists use the term association to describe how a disease occurrence varies as a result of the effect of an exposure. A positive association indicates that the exposure increases risk of the outcome; a negative association indicates that the exposure decreases risk of the outcome.

Etiology: The etiology is the cause or origin of a disease or condition.

Multi-factorial etiology: Very few cancers occur as a result of only one cause. Most, on the other hand, have several likely causes, each with different levels of effect. The most common risk factor for cancer is age, as older persons have increased risk for developing most of the common cancers. So, even though certain human papilloma viruses increase

risk for head and neck cancers, their effect is most often seen with increasing age despite individuals acquiring the virus at a young age. For some cancers, exposures add to the effects of other exposures, or even multiply their effects. For example, both smoking and alcohol use increase risk for squamous cell carcinoma of the esophagus, but individuals who both smoke and drink have a risk of this cancer that is greater than what would be expected by adding the effects of the two exposures.

Latency period: The length of time between when a person is exposed to a causal agent and when their cancer is first diagnosed is called the latent period. This period is typically years to decades. For exposures that continue over time, it may not be possible to determine the latency period of that cancer.

Relative risk, odds ratio, and hazard ratio: The strength of a relationship between an exposure and the occurrence of disease is commonly expressed in terms of relative risk. In cohort studies, relative risk is the ratio of risk (or incidence) of a disease among people with an exposure to that among people without that exposure. In cohort studies, the hazard ratio can be used, and is the chance of an event occurring in one group (exposed) divided by the chance of the event occurring in another group (non-exposed). In case-control studies, the odds ratio is used, which is the ratio of the odds of exposure among cases to the odds of exposure among controls. Relative risks, odds ratios, and hazard ratios above 1.0 indicate an increased risk, while those below 1.0 imply a protective effect. Therefore, a relative risk of 1.3 represents a 30% increased risk.

Statistical analyses: Epidemiologists use several types of statistical analyses to determine the size and significance of relationships among variables in sets of data. The most common in observational studies are the relative risk, odds ratio, and hazard ratio. These estimates are based on individual studies, or on meta-analyses, which are based on data from multiple studies. To determine the likelihood of these being true estimates of risk, rather than just occurring by chance, epidemiologists determine the statistical significance. For the relative risk, odds ratio, and hazard ratio, we calculate a confidence interval (CI), which shows the range of values that the true risk estimate likely represents. Most commonly, we use 95% CI, which means we are 95% sure that a true relative risk or odds ratio lies within that interval of numbers. If a confidence interval includes the number 1.0, then we say the association between the exposure and the disease could be null. Some epidemiologists consider a CI that has 1.0 at one end of the range to be of "marginal statistical significance." A similar statistic is the p-value, which estimates how likely the observed association is likely due to chance. Epidemiologists often consider a p-value less than or equal to 0.05 as "statistically significant," and often describe p-values between 0.05 and 0.09 as "marginally statistically significant." However, the term just refers to the likelihood of a chance finding.

Both confidence intervals and p-values depend largely on the size of the population studied. If a relative risk/odds ratio indicates an effect that is consistent across studies, or that is large, we are less likely to reject the likelihood of true association, even if the confidence interval includes 1.0 or if the p-value is greater than 0.05.

Sample size: Because development of cancer can be a random event, epidemiologists strive to determine whether an association between an exposure and disease could have occurred by chance. If the study is designed appropriately, the chance of random-ness explaining observed associations is lessened. The number of cases of cancer within the study is a critical element to determining likelihood of causality.

Standardized incidence ratio and standardized mortality ratio: In some epidemiologic studies, only highly exposed persons are available for study. This is a common occurrence in studies of occupations with high levels of exposures to carcinogens, such as asbestos. Researchers typically then compare the incidence (or mortality) in the exposed cohort with the general population from which the exposed cohort is drawn. The standardized incidence ratio compares the actual versus expected number of cases of a disease, using the population data to determine expected numbers. Similarly, the standardized mortality ratio compares actual versus expected numbers of cause-specific or overall deaths. The standardized incidence ratio and standardized mortality ratio are similar to relative risks, and 95% confidence intervals are often presented.

Dose-response: "Dose response" began as a medical concept where it denotes a change in the effect of a medication or treatment according to the dose used. This concept can be applied to any exposure, including potentially toxic agents such as talcum powder products. The demonstration of a biological gradient adds weight to evidence that an exposure may be causal.

Dose response effects may be linear, where an increase in the exposure increases risk of disease at each level of increase in the exposure. A common example is the relationship between average packs/day and years of cigarette smoking and risk for lung cancer. Alternatively, there may be a 'threshold' below which there is no effect seen, but above which there is an effect. An example is the association between exposure to menopausal hormone therapy; use for short periods has little effect on risk of breast cancer, but risk consistently increases for five years' or longer use.

Alternatively, the effect may be to influence risk one way at both low and high levels of exposure, but the other way at intermediate levels of exposure, shown as 'J'- or 'U'-shaped curves. In such cases, the exposure is evidently beneficial or harmful only within certain ranges. For example, intake of alcohol at small amounts has been related in some studies to lower risk of cardiovascular disease, whereas heavy intake increases risk.

Some exposures that are continuous variables are often reported in discrete categories. Although this is done for statistical reasons and can make effects easier to detect, the number and location of category boundaries may obscure the true relationship between exposure and the outcome, and non-linear effects of exposure may be missed if inappropriate categories are used.

Bias: A systematic error in the design, recruitment, data collection or analysis that results in a mistaken estimation of the true effect of the exposure and the outcome.

Confounding: This type of bias occurs when a third variable interferes with a true relationship between an exposure and an outcome. A confounding variable is one that is related to the risk of disease and to the exposure. It is not by itself a cause of the disease and does not lie in the pathway between the exposure and disease. A classic example is that individuals who report carrying matches in their pockets are more likely to develop lung cancer than individuals who do not carry matches. However, the true relationship is between smoking and lung cancer. Smokers are more likely to carry matches, and it is the smoking that is the true cause. The epidemiologic studies reviewed for this report all adjusted for potential confounding factors.

Effect modification: In some persons, an exposure increases risk of disease while in others it has no effect or has a smaller effect. This is called effect modification. An example is that obesity has a larger effect on risk for colon cancer in men than in women.

Generalizability: The goal for epidemiologic research is to identify causes of disease that can be applicable to all populations. Most modern-day case-control studies attempt to do this by conducting population-based studies. That is, they identify all cases of a cancer occurring in a population and attempt to interview as many of those cases as possible. They also identify a similar sample of persons from the same population who do not have cancer and attempt to interview as many of those as possible. Many of the case-control studies of talcum powder products identified cases through population-based cancer registries, which register almost 100% of cases of cancer occurring in the population served by the registry. These population-based studies are better able to produce results that are generalizable to the whole population. Hospital-based case-control studies of ovarian cancer include all cases of the cancer that present to a hospital and compare them to a comparable group of hospitalized patients without cancer. While the comparisons between cases and controls can be valid, the generalizability of the results to the population can be low if patients from the recruiting hospital differ from the population as a whole.

Generalizability can be more of an issue for cohort studies, depending on how the study participants were recruited. Three cohort studies have reported on talcum powder product use and ovarian cancer risk. The Women's Health Initiative recruited from the general population of postmenopausal women from 40 clinical centers around the U.S. The rate of response was only around 1-2%, however, and therefore the cohort is unlikely to represent the population of American postmenopausal women. The Nurses' Health Study recruited nurses from around the U.S. Their rate of response was higher than for the Women's Health Initiative, but they are all nurses, and therefore have different health knowledge, income, and socioeconomic status compared with the general U.S. population. The Sisters' Study recruited from the general population, targeting women who had at least one sister with breast cancer. The responding participants therefore represent only women with a family history of breast cancer, and given their self-selection, likely differ from the general population in vulnerability to cancer and other characteristics.

Exposure measurement: Defining whether a person is exposed to a potentially causal agent is critical to the science of epidemiology. For many exposures, we must rely on what the individual can tell us about their health habits, lifestyle, work history, and use of products and medications. Recall of these variables can be challenging. Epidemiologists, therefore, often have interviewers use tools to jog participants' memories, such as anchoring around particular ages and life events. The most thorough case-control studies queried about both frequency and duration of use of talcum powder products, as well as brand and type of product, and areas of exposure (e.g., perineal, sanitary napkin, other body areas, diaphragm, etc.) The ascertainment of use of talcum powder products is difficult, especially in determining dose of exposure, because women may have been using powders without being aware of what the product contained.

Furthermore, information on the variable contents of talcum powder products (talc, fibrous talc, asbestos, other metals, fragrance) was not available to the scientists conducting the epidemiologic studies. While many epidemiologic case-control studies of talcum powder products and ovarian cancer risk asked women for brand names and dates of use, and analyzed data separately by likely powder contents, these analyses will not have been able to identify the various constituents of talcum powder products.

The Women's Health Initiative asked about duration of use of talcum powder products but did not ask about frequency of use.(29) The Nurses' Health Study asked about frequency of use but did not query regarding duration of use.(31) The Sisters' Study asked participants about use of talcum powder products in the 12 months before study enrollment, and the frequency of use.(30) None of the cohorts, therefore was able to estimate total lifetime dose of talcum powder product exposure. As described below, under-reporting of exposures will underestimate a true relative risk.(45) Therefore, the estimated relative risks in studies that looked at effects of talcum powder product use and risk of ovarian cancer may be under-estimates.

Diagnosis and classification of disease outcome: "Outcome" refer to the disease or health condition of interest; in this report, any type of epithelial ovarian cancer is the outcome. In some reports, cancers of the fallopian tubes and peritoneum are combined with epithelial ovarian cancer, as they are believed to be the same biological process and are treated the same as ovarian cancer with surgery and chemotherapy (https://www.cancer.gov/types/ovarian/hp/ovarian-epithelial-treatment-pdq).

Determination of outcomes (sometimes called "events") is a critical part of epidemiologic research. If cases of a disease are over- or under-counted, results of exposure-disease associations will be skewed. If the source of cases differs from the source of controls, comparisons between cases and controls may be biased. In case-control studies, researchers try to include all cases that were newly diagnosed with the disease in a defined population within a set period. Population-based cancer studies often identify cases through population-based cancer registries. Hospital-based studies, conversely, identify cases that were newly diagnosed in one or more hospitals. Whichever method is used, researchers try to include and interview as high a proportion as possible of identified cases, to reduce chances of biased results.

For epidemiologic studies of cancer, it is important to identify, at the minimum, the type of cancer, stage of cancer at diagnosis, and subtype of cancer. Using pathologists' reports from medical records, trained coders classify patients into the correct categories depending on the pathology and other medical records. There are several different subtypes of

cancer of the ovary. Over 90% originate in epithelial tissues and are called "epithelial ovarian cancers." The remaining 10% originate in other ovarian tissues (germ cell or sex-cord stromal). Of the epithelial ovarian cancers, approximately 70% are serous, 10% are endometrioid, 12% are clear cell, 3% are mucinous, 1% are Malignant Brenner, and the remaining are mixed histologies.(46) Epithelial ovarian cancer may be invasive or borderline. Only epithelial ovarian cancer has been studied in relation to use of talcum powder products. Therefore, in this report, "ovarian cancer" refers to "epithelial ovarian cancer."

Types of Epidemiologic Studies on Ovarian Cancer and Exposure to Talcum Powder Products

Epidemiologists have assessed the relationships between use of talcum powder products and risk of ovarian cancer development, using several types of epidemiologic studies. The studies with the greatest number of cases of ovarian cancer used case-control designs. Most of these were designed specifically to address use of talcum powder products as a potential cause of ovarian cancer. Three cohort studies have also reported on associations between talcum powder product use and risk of ovarian cancer. These cohort studies were designed to test hypotheses relating hundreds of exposures to scores of disease outcomes including common cancers, cardiovascular disease, cerebrovascular disease, musculoskeletal diseases, and others. Finally, after several epidemiologic studies were published, researchers combined data from these studies using either meta-analyses or a pooled analysis. The pooled analysis also included data from previously unpublished studies, and therefore provide additional information beyond just summarizing results of published studies. All of these studies contribute to the science of the epidemiologic evidence relating use of talcum powder products to risk of ovarian cancer development. The totality of evidence on the causal effect of talcum powder product use on ovarian cancer development relies on data from epidemiologic studies, pathological evidence of migration to the ovaries of talc and other contents of talcum powder products (such as asbestos), and laboratory evidence.

Critical Components to Both Case-control and Cohort Studies

- 1) The accurate and complete ascertainment of cases. In case-control studies, this means that all cases of ovarian cancer should be identified in a given population and as high percent of them should be included in the study as possible. The controls should be free of ovarian cancer and should be as similar as possible to the cases except for the exposure under study. In cohort studies, this means that all individuals should be followed over time to determine how many did or did not develop ovarian cancer. For both types of studies, cases should be confirmed by medical record and pathological report review.
- 2) Precise determination of exposure. In both case-control and cohort studies, both cases and non-cases should have completed questionnaires about their current and past history of use of talcum powder products, including how often they used the products, when they began use, and number of years used. In case-control studies, this is often done with the help of a trained interviewer. In cohort studies, which typically involve larger numbers of participants because only a small fraction will go on to develop specific diseases, questionnaires are usually self-administered without the assistance of an interviewer. In cohort studies, exposures should be updated after the baseline assessments, to ensure that changes in exposure can be captured. For an exposure like talcum powder product use, lifetime use would be relevant for determining total exposure. For both case-control and cohort studies, determining early life exposures depend on participants' ability to recall typical use patterns. Interviewer-administered surveys would typically include prompts to help participants recall past habits. Self-administered questionnaires may include some printed prompts, but these are usually minimal.

For a rare endpoint like ovarian cancer, a cohort must be followed for decades in order for a sufficient number of cases to accrue to determine effects of particular exposures. Therefore, there is the possibility of bias towards the null via changes in behavior over the course of the decades of follow-up. A woman who was originally classified as an "ever" talc user will remain an "ever" user even if she subsequently discontinued talc use. A "never" user who subsequently begins talc use will always be misclassified as a never user unless a follow-up survey records her change in status.

In ideal situations, the precise nature of the exposure would be verified. Despite habitual use, however, quantification of exposure is difficult.

(3) For both case-control and cohort studies, the populations should be well-characterized, so that any potential confounding variables can be accounted for in comparing exposure rates of cases and non-cases.

Case-control Studies

In case-control studies, individuals diagnosed with a specific type of cancer (cases) are compared with otherwise similar individuals who have not been diagnosed with cancer (controls). The control group is a sample of the population from which the cases arose and provides an estimate of how the exposures being studied are distributed in that population. In the ideal case, the controls will be similar to the cases on all variables other than the exposure under question. Therefore, epidemiologists often match controls to cases on such variables as age, race, and ethnicity, or they include a large enough sample of participants that they can adjust for these variables.

Case-control studies can enroll a large number of cases, are usually less expensive than cohort studies, and can be completed over shorter periods of time. Relevant to this report, case-control studies also can be designed to answer specific questions related to one outcome, and participants can be queried in detail about certain exposures. Selection bias is an increasing problem if participation rates among case and control groups is substantially less than 100 percent, and where participation may be related (in different ways) to various exposures.

Case-control studies are subject to their own limitations, including recall bias, which can occur when participants' reports of various exposures are differentially affected by whether they are cases or controls in the study. This is a theoretical bias however; studies that have investigated other sources of data on exposures have failed to confirm the presence of differential recall between cases and controls.(47)

One of the case-control studies of talcum powder product use and ovarian cancer risk (1) addressed this issue by counting as "users" only women who had used talcum powder products for at least six months, on at least a monthly basis. This procedure minimizes the potential over-reporting of minimal exposure by cases versus controls.

For this report, I reviewed 28 case-control studies, for most of which the association between use of talcum powder products and risk of ovarian cancer was a primary research questions.

Cohort Studies

In prospective cohort studies (usually called cohort studies), the exposures of a large group (cohort) of people who are assumed to be healthy are assessed, and the group is followed over a period of time. During the follow-up period, some members of the cohort will be diagnosed with cancer, while others will not, and comparisons are then made between these two groups. Cohort studies may need to be very large (up to hundreds of thousands of participants) to have sufficient statistical power to identify factors that may increase cancer risk by on the order of 20 or 30 percent. In addition, meaningful comparisons between cases and non-cases can be made only for factors that vary sufficiently

within the cohort. Importantly, cohort studies must identify exposures of interest when participants are enrolled into the study, in order to determine effect of the exposures on eventual development of the outcome of interest. Alternatively, if an exposure is ascertained some time after enrollment (as in the Nurses' Health Study ascertainment of talcum powder product use), the researchers will consider the date of collection of that exposure data to be the start date for follow-up of study participants. Because cohort studies typically are designed to look at multiple outcomes such as cancers, cardiovascular diseases, mortality, and other diseases, information collected on exposures tends to be minimal, to pertain to current levels of exposure, and may not be updated during follow-up.

Cohort studies provide the opportunity to obtain repeated assessments of participants' exposures at regular intervals, which may improve the assessment of the exposures. However, for this to happen, the investigators need to have planned for repeated measures of the exposure. In published cohort studies of talcum powder products and ovarian cancer risk, no repeated measures of talcum powder products were reported.

In cohort studies, the ascertainment and adjudication of cancer outcomes can be accomplished by directly asking participants about illnesses and hospitalizations, and requesting medical records for reviewing these events. In some cases, ascertainment of disease events may be accomplished by linking to a cancer registry.

For this report, I reviewed results of 3 cohort studies, published in 5 papers. None were designed specifically to look at the association between talcum powder product use and risk of ovarian cancer. Further, none of these studies fully ascertained exposure to talc, as will be discussed below.

Meta-analyses

Because there can be random variations within individual epidemiologic studies, and because very large sample sizes may be needed to see effects on rare diseases, epidemiologists rarely make causal inferences based on results of one study. Rather, we look at the totality of epidemiologic studies to determine patterns of exposure-disease relationships. Meta-analysis is a method used to combine the statistical results of several studies to produce an average estimate of effect of an exposure on an outcome of interest. These summary estimates can provide evidence regarding the presence or absence of an association and can allow examination of dose-response relationships. In the area of talcum powder products use and ovarian cancer, 7 meta-analyses have been published (11, 22, 34-38), two of which are very recent and covered all studies contained in the previous meta-analyses.(34, 35) Of the 7 meta-analyses, 2 were included within reports of individual case-control studies (11, 22); the two recent meta-analyses contained all studies included in these 2 meta-analyses as well.

Pooled analysis is a type of meta-analysis where original individual-level data from various published and/or unpublished epidemiological studies are combined and re-analyzed. The combination of data from multiple studies creates a larger data set and increased statistical power. One such pooled analysis was published on the relationship between talcum powder product use and risk of ovarian cancer, and is heavily cited in this report because of its significance in including very high numbers of women with ovarian cancer and controls, thereby providing a high degree of statistical power. (39)

The 7 meta-analyses that I reviewed for this report included data from available cohort and case-control studies. I also reviewed the pooled analysis of 8 case-control studies.(39) In addition to effect measures (relative risks, odds ratios, hazard ratios) and their confidence intervals (or other test of statistical significance such as p-value), I reviewed the number of people with and without disease for each exposure category, method of exposure ascertainment, estimated exposure categories, assessment of dose-response effects, and effect sizes for all epithelial ovarian cancer and for subtypes of epithelial ovarian cancer (invasive, borderline, serous, endometrioid, mucinous, clear cell).

Possible Sources of Bias in Epidemiologic Studies Reviewed

All studies of all types must be criticality evaluated for both strengths and potential limitations in order to determine the totality of evidence. Limitations in epidemiologic studies are often characterized as biases. These include the biases listed below. It is important to note that the presence of bias does not render an epidemiologic study invalid. Rather, biases are issues that should be carefully considered when assessing how much weight should be given to individual studies, and what conclusions can be drawn from them.

Missing data: Both case-control and cohort studies can suffer from missing data. If the missing data items are related to the use of talcum powder products, then the estimated relative risks/odds ratios will likely be artificially low. If, in cohort studies, the cases of ovarian cancer are not identified, i.e., the cancer data are missing, the statistical power to detect statistically significant effects will be lessened. Both of these conditions would likely mean the true association between use of talcum powder products and risk of ovarian cancer is actually higher than what is observed in the epidemiologic studies.

Poor precision of exposure measurement: Determining whether, how much, and for how long women were exposed to talcum powder products is difficult. Women may not remember the brand of powder products they used, and contents of personal powder products may not be clear or may change over time. Women may not remember the amount of products used, frequency of use, and years of use.

Publication bias: The publication of epidemiologic studies depends on several factors. The investigators must have developed hypotheses about certain questions and designed the study accordingly, including asking the correct questions about the exposure and potential confounding variables, and collecting information from a sufficient number of participants. The investigators then need to perform statistical analyses, develop scientific manuscripts, and submit for journal publication. It may be difficult to find a journal that will accept null results (i.e. where an exposure is shown to not be related to an outcome).(48, 49) The pooled analysis of case-control studies provides some reassurance that publication bias is less likely for this association.(39) Of the 8 studies included in that analysis, 3 had not been previously published. Ever use of talcum powder products in the genital area produced odds ratios of 1.37 (95% CI 1.07–1.67), 1.36 (95% CI (1.06–1.74), and 0.99 (95% CI 0.70–1.41) for the 3 individual studies. That the confidence intervals overlapped, and that 2 of the 3 studies showed statistically significant associations, suggest low publication bias for the association between use of talcum powder products in the genital area and risk of developing ovarian cancer.

Cancer process affecting likelihood of exposure: If women used talcum powder products in the perineal area due to symptoms from an early cancer process, results of studies could be biased. Cohort studies often guard against this by eliminating cases that develop within a short time of study enrollment. Case-control studies guard against this by asking participants to recall exposures one or more years prior to their cancer diagnosis (and similarly ask controls to recall exposures at least one year prior to interview).

Confounding: Variables related to both use of talcum powder products and risk of ovarian cancer could mask the true relationship between these variables. Epidemiologists handle this by adjusting in the analysis for these potential confounding variables. All of the studies reviewed performed adjustment for several potential confounding variables. Those studies that presented both adjusted and unadjusted odds ratios/relative risks found little effect of confounding variables on these relationships.

Recall bias: For the case-control studies, media reports of associations between talc and ovarian cancer could have influenced cases such that they recalled use of talcum powder products to a greater degree than controls. However, the studies for which data collection pre-dated news reports of this association showed similar effects to those for which data were collected afterward. Thus, "recall bias" is unlikely to be an issue. As mentioned above, recall bias is a theoretical bias; studies that have investigated other sources of data on exposures have failed to confirm the presence of differential recall between cases and controls.(47)

Non-response bias: Case-control studies with low levels of response in cases or controls can be biased, in that the non-responding cases and controls could differ with respect to use of talcum powder products.

Differential results of cohort versus case-control studies: Ideally, results of case-control and cohort studies would be similar for the relationship between an exposure and risk of disease. However, there could be several reasons for discrepancy in results between case-control and cohort studies. The exposure measurement may differ in the two types of studies. For example, cohort studies may measure exposure at study entry without updating and without ascertaining lifetime exposure. The study would then have only one time point of an exposure that could significantly attenuate the observed associations between exposure and disease.

Population-based case-control versus hospital-based case-control studies: For some exposure-disease relationships, population-based case control studies are the most valid method of comparing risk for exposed versus non-exposed persons because the risks to public health can better be estimated. For others, however, hospital-based case control studies may provide important information because controls with illnesses may be more likely to recall exposures compared with healthy controls from the community, and therefore recall bias can be reduced.

Causal Inference in Epidemiology

The overarching goal of epidemiologic research is to determine likely causes of disease, in order to determine who is at risk for that disease and how to prevent the disease in individuals and populations. Much of epidemiologic observational research in cancer focuses on determining the *associations* between an exposure and an outcome. In other words, in a sample of individuals, are the number of persons exposed to an agent more likely to develop a cancer than those who are not exposed? There are several related questions. For example, will the persons who are exposed to a higher dose have an even greater risk than persons with little exposure? Will those exposed for a longer period of time have greater risk than those exposed for only a short time? Epidemiologists follow guidelines and logic in determining likelihood of an exposure causing cancer.(50) In addition to epidemiologic data, epidemiologists also consider plausible biological mechanisms to explain observed associations. The weight of evidence depends on the validity of the data as well as the clinical and biological evidence, if available, to explain these associations.

In epidemiology, and therefore in this report, a positive association means that the exposure in question increases risk for a disease or outcome. A negative association refers to an exposure decreasing risk for the outcome.

In 1965, English epidemiologist Sir Austin Bradford Hill attempted to describe several aspects of the causal relationship in a speech to the Royal Society of Medicine's newly-established Section of Occupational Medicine. (43) As Bradford Hill explained, this is not a checklist of factors to be counted: "What I do not believe—and this has been suggested—is that we can usefully lay down some hard-and-fast rules of evidence that must be obeyed before we accept cause and effect. None of my nine viewpoints can bring indisputable evidence for or against the cause-and-effect hypothesis and none can be required as a *sine qua non*."

These aspects of a causal relationship are:

Strength of the association. If the risk of developing cancer is several times higher in persons exposed to a toxic agent, that increases the likelihood of causality. It is not a necessary condition for establishing causality and providing recommendations for avoiding a potential cancer-causing agent, however. Indeed, several carcinogens raise risk of cancer less than doubling of risk, but because of a high prevalence of exposure, can have major public health effects. Other exposures may be highly prevalent to certain groups such as factory workers; such exposures need to be minimized to meet government regulations for worker safety. Several examples follow:

Alcohol and risk for postmenopausal breast cancer: Risk for postmenopausal breast cancer increases by approximately 10% (a relative risk of 1.1) for each 10 gram/day intake of alcohol (the amount in a four-ounce glass of wine).(51) Women are advised to avoid alcohol or minimize alcohol intake to no more than one alcoholic drink per day to reduce risk for this cancer.(51) As Bradford Hill pointed out in his address: "We must not be too ready to dismiss a cause-and-effect hypothesis merely on the grounds that the observed association appears to be slight. There are many occasions in medicine when this is in truth so."(43)

Air pollution and risk for cardiovascular disease: A 2013 meta- analysis found that for each 10 μ g/m3 rise in PM_{2.5}, the air pollution caused by motor vehicles, yields an 15% increase in risk of cardiovascular disease (similar to a relative risk of 1.15). Given the widespread prevalence of exposure to ambient pollution, even modest contributions to cardiovascular disease risk can have a substantial effect on population health. (52)

Outdoor particulate matter air pollution and lung cancer: A 2014 meta-analysis including 18 studies showed a relative risk of 1.09 (95% CI 1.04-1.14) per $10-\mu g/m^3$ of exposure to particulate matter (PM_{2.5}).(53) This is highly significant, because $10-\mu g/m^3$ of exposure to PM_{2.5} is the lowest recommended limit set by IARC for minimizing health effects of air pollution.

Benzene at work and risk of leukemia: In 2010, a meta-analysis of 15 epidemiologic studies found that worksite benzene exposure increased risk of any leukemia by 40% (relative risk 1.40, 95% CI 1.23-1.57).(54)

Estrogen-progestin menopausal hormone therapy and breast cancer risk: The Women's Health Initiative clinical trial showed that this type of hormone therapy increases risk of breast cancer by 26% after an average 5 years of use. That level of risk was sufficient for clinical interest groups and governmental agencies to advise women to use hormone therapy for limited periods of time, if at all, because of risk for breast cancer and other adverse events with similar levels of increased risk (29% increase in coronary heart disease, and 41% increase in stroke).(55) A meta-analysis of clinical trials and observational studies in 2018 found that use of this therapy increased risk of breast cancer by 59% (relative risk 1.59, 95% CI 1.40-1.81).(56) These results led to FDA-required label warnings on estrogen and progesterone therapy preparations(57), and to clinical warnings against use of estrogen plus progesterone for prevention of chronic conditions.(58)

Trichloroethylene and risk of kidney cancer: In 2012, a meta-analysis was published showing that occupational exposure to trichloroethylene was associated with an approximately 30% increased risk for kidney cancer (relative risk 1.32, 95% CI 1.17-1.50).(59)

Regular physical activity is associated with reduced risk for cardiovascular disease, diabetes, and various cancers in persons who meet national physical activity guidelines of 150 minutes/week of moderate-intensity aerobic activity.(60) In one large pooled analysis of 6 cohorts with 661,137 men and women, investigators found a 20% lower mortality risk among those performing less than the recommended minimum of 7.5 metabolic-equivalent hours per week (hazard ratio, 0.80 [95% CI, 0.78-0.82]), a 31% lower risk at 1 to 2 times the recommended minimum (hazard ratio, 0.69 [95% CI, 0.67-0.70]), and a 37% lower risk at 2 to 3 times the minimum (hazard ratio, 0.63 [95% CI, 0.62-0.65]).(61) To compare with the relative risks for adverse exposure, one would look at the inverse of the hazard ratios, i.e., 1.25, 1.45, and 1.59.

Intermittent intense sun exposure and risk of melanoma: A 2005 meta-analysis included data from 57 epidemiologic studies with 38,671 cases of melanoma, and found a relative risk of 1.61 (95% CI 1.31-1.99) for intermittent intense sun exposure.(62)

Prevention of skin cancer with use of sunscreen has also been observed, with similar effect sizes. In a 4.5-year trial with an additional 8-years follow-up, individuals randomly assigned to daily sunscreen use had almost a 40% reduced risk of squamous cell carcinoma (rate ratio, 0.62; 95% confidence interval, 0.38-0.99).(63) To compare with the relative risks for adverse exposure, one would look at the inverse of the risk ratio, i.e., 1.6.

Consistency of the association. A consistent association would be observed in various populations, places, circumstances, and times. Has the association been found in different countries, in persons from various race/ethnic groups, and of different ages? This is also not a requirement, as there could be occasions when an exposure only increases risk for specific categories of individuals. An example, again from the breast cancer field, is that obesity increases risk for breast cancer occurring after menopause but decreases it for women who have not yet undergone menopause. Relevant to the association between ovarian cancer risk and use of talcum powder products, the association has been observed in the U.S., Canada, China, Australia, Israel, and the UK. While most data have been collected in Whites, a positive association between use of talcum powder products and risk for ovarian cancer has also been found in Blacks and Asians.

Specificity of the association: This suggests that if an exposure causes only one type of disease, that its causal link to that disease is strengthened. However, Bradford Hill recognized the limits of this aspect. One noxious agent, such as tobacco smoke, is an accepted cause of multiple cancers as well as cardiovascular disease. Similarly, one disease can have multiple causes. For example, lung cancer risk is increased with exposure to radon and asbestos, even in persons who do not smoke. In support of this, Bradford Hill stated, "One-to-one relationships are not frequent. Indeed I believe that multi-causation is generally more likely than single causation..." (43)

Temporality: The time course between exposure and disease occurrence is an important consideration. Bradford Hill was referring to the need to document that the exposure came before the disease, rather than something about the disease causing a person to come into contact with the exposure. This is why, for case-control studies, researchers have often queried women about their lifetime history of use of talcum powder products, beginning from young ages. Some cohort studies, on the other hand, asked about current use of these products when the women were first enrolled in the cohort. However, for all of these studies, only talcum powder product use prior to the cases' diagnoses (and prior to a comparable time point for controls, in case-control studies) was counted as "exposure."

Biologic gradient: This refers to the dose-response curve or the shape of the association between exposure and risk as the amount of exposure changes. If risk for a disease increases with increasing amount of exposure, the likelihood of a causal relationship is often increased. The exposure can be classified by total duration of exposure, by usual amount of exposure, or by a combination of these two. For use of talcum powder products, dose has been estimated by total years of use, by frequency of use, and by a combination of these two variables. It should be noted that ovarian talc particle burden may not be influenced by number of applications of perineal talc usage(64), and therefore the typical dose-response relationship may not be necessary for establishing causality between perineal talcum powder product use and risk for ovarian cancer. Indeed, there are numerous substances for which there is no safe dose.

Plausibility: The association is strengthened if it is biologically plausible. However, Bradford Hill recognized that "What is biologically plausible depends upon the biological knowledge of the day." It is important to note that biologic plausibility does not require proof of mechanism.

Coherence: The cause-and-effect interpretation of the data should not significantly conflict with the known facts about the natural history and biology of the disease. Therefore, for example, the concurrent rise in tobacco smoking rates and rise in lung cancer incidence in the 20th century in the U.S., as well as the more recent concurrent decrease in smoking rates and decrease in lung cancer occurrence, strengthen the association between smoking and lung cancer as causal. For the case of use of talcum powder products and ovarian cancer risk, the prevalence of other risk and protective factors (e.g., use of oral contraceptives, hysterectomy, and tubal ligation as protective factors, obesity as risk factor) changed over time in the general population. Therefore, it would be difficult to determine if ovarian cancer incidence time trends vary by changes in use of talcum powder products. The biology involves, as described below, the migration of talc to the ovaries, the inflammatory process which talc elicits, and the carcinogenetic effects of inflammation.

Experiment: The evidence from randomized controlled trials can provide strong support to observational evidence. However, in many situations, randomized controlled trials are not feasible. In the case of talcum powder products and

ovarian cancer risk, a trial would have to be very large, involving 50,000 women or more, followed for decades, to determine effects of use of talcum powder products on risk for ovarian cancer. This is because ovarian cancer is a rare disease and typically takes many years to develop to be clinically diagnosable. In addition, because the effects of genital talcum powder product use could be harmful, it would be unethical to conduct a trial of this type.

Analogy: Bradford Hill states that in some circumstances it would be fair to judge by analogy. Therefore, since some toxic agents such as thalidomide or rubella have been shown to cause birth defects, other drugs or viral exposures may be recognizable as possibly leading to harmful effects to a fetus. Regarding talcum powder products use and ovarian cancer use: since increased inflammation has been associated with increased ovarian cancer risk, and since talc causes an inflammatory response in tissues, this strengthens the link between talcum powder products use and ovarian cancer risk.

Methods Used for this Review

In performing this evidence review and for purposes of my opinions, I first conducted a review of the relevant literature on the epidemiology of ovarian cancer risk in relation to use of talcum powder products, using the same process I use for systematic review articles I write for my academic work.(60, 65) I triaged articles by title, then by abstract, and finally by complete paper. As I read the epidemiologic literature, I considered the "Bradford Hill" aspects of causal inference (43), as well as causal inference as defined by Rothman(50), and weighed the evidence. My search identified studies that both support and do not support my eventual opinion on whether use of talcum powder products can cause ovarian cancer.

I searched in the PubMed database for research studies published in peer-reviewed, PubMed indexed journals, using the following search terms: ("talc" OR "talcum powder") AND ("ovarian cancer" OR "ovarian carcinoma").

The search produced 110 references, of which 7 included meta-analyses (11, 22, 34-38), one was a pooled analysis (39), and 33 were reports of original epidemiologic studies that tested the association between talcum powder products and risk of ovarian cancer.

I did not perform a meta-analysis, because excellent meta-analyses have been recently published, (34, 35) and all of the published meta-analyses showed similar relative risk estimates for use of talcum powder products and risk of ovarian cancer. For all of the reviewed studies, I performed data extraction using a standardized data extraction table. I recorded information on the publication year, study design, number of cases, number of controls (for case-control studies), total sample size (for cohort studies), population type, country, risk estimates, confidence intervals, and the type of ovarian cancer. I also indicated whether dose-response relationships were assessed, method used, and results.

In this report, I provide descriptions of the study methods and main study results including risk estimates (odds ratio, relative risk, or hazard ratio). All studies included control for some confounders and presented the risk estimates with adjustment for the confounders. I present below the results from adjustment with the greatest number of variables.

Epidemiologic Evidence on the Association between Talcum Powder Products Use and Ovarian Cancer Risk

Case-control Studies

Schildkraut *et al.* (2016)(1) investigated the association between body powder use and ovarian cancer in African American women in 11 geographic areas of the U.S. Included were 584 cases and 745 controls, in a population-based study. Cases were identified through state or SEER cancer registries, or through hospital gynecologic oncology departments. Controls were randomly selected from the same populations as the cases. Participants were asked in a

phone interview whether they had ever regularly used talc, cornstarch, baby, or deodorizing powders. Women were classified as "regular users" if they reported using any of these powders at least monthly for at least 6 months, and "never users" otherwise. Regular users were asked about frequency and duration of use; use on genital areas, underwear, sanitary napkins, or diaphragms; and use on non-genital areas. Lifetime number of applications was estimated as number of applications per month times number of months used. Occupational exposure (yes/no) was ascertained for a subset of participants. Use of genital powder was associated with a statistically significant 44% increased risk for ovarian cancer (odds ratio 1.44, 95% CI 1.11-1.86). A dose-response trend was noted: compared with never-users, women who used genital powder less than daily had a 12% increased risk for ovarian cancer, while women who used genital powder daily had a 71% increased risk. The statistical test for trend was significant (p < 0.01). Furthermore, a greater number of years used increased risk further: compared with never-users, women who used genital powders for less than 20 years had a 33% increased risk of ovarian cancer, while those who used genital powders for 20 years or more had a 52% increased risk of ovarian cancer. The statistical test for trend was significant (p = 0.02). Estimated lifetime number of applications was also related to risk in a dose-dependent manner. Compared with never users, those who used few than 3600 genital powder applications had a 16% increased risk for ovarian cancer, while those who used 3600 or more applications had a 67% increased risk. The statistical test for trend was significant (p < 0.01). Risk of both serous and non-serous ovarian cancer increased statistically significantly with any genital powder use by 38% and 63%, respectively (odds ratios, 1.38, 95% CI 1.03-1.85, and 1.63, 95% CI 1.04-2.55, respectively).

Cramer et al. (2016) (2) reported on association between genital talc use and risk of ovarian cancer in 2,041 cases of ovarian cancer and 2100 controls. Cases were combined from three case-control studies interviewed in 1992-97, 1998-2002, and 2003-2008. Cases were identified from tumor boards and registries in Eastern Massachusetts and Massachusetts. Controls were identified from the same populations as controls. Interviewers asked participants if they "regularly" or "at least monthly" applied powder to the genital or rectal area, sanitary napkins or tampons, underwear, or non-genital areas. Type of powder, age begun, years used, and applications per month were ascertained. Lifetime exposure was estimated by multiplying frequency of applications per month by months used, and talc-years were calculated. Participants were then divided into quartiles according to these variables. Participants were also asked if their partners dusted or sprayed powder to their genital or rectal areas. Condom and diaphragm use were ascertained as potential sources of genital talc exposure. Genital talc use was associated with a statistically significant 33% increased risk of ovarian cancer (odds ratio 1.33, 95%CI 1.16-1.52). Risk decreased with increasing time since last use. There was a clear trend to increasing risk for ovarian cancer with increasing frequency of use: compared with never users, risks for 1-7 days per month, 8-29 days per month, and 30 or more days per month were increased by 17%, 37%, and 46%, respectively, and the trend was statistically significant (p<0.0001). Furthermore, as months per year of use increased, risk increased, and the trend was statistically significant (p=0.006). Risk for serous invasive, endometroid invasive, and serous borderline were increased with any genital talc use, by approximately 40%, and all were statistically significant. Risks of serous invasive and endometroid also increased significantly with increased talc-years of use. Risks of serous invasive were increased in both premenopausal and postmenopausal women who used genital products, but the results were only statistically significant in premenopausal women. Premenopausal women and postmenopausal women using hormone therapy had the largest risks associated with talcum powder product use for most types of ovarian cancers.

Wu *et al.* (2015) (3) investigated the associations of risk of ovarian cancer and talcum powder products use and other risk factors. Cases were identified through the SEER population-based University of Southern California cancer registry. A total of 1,701 patients were included; and 2,319 controls were recruited from the cases' neighborhoods using random selection from population lists. In-person interviews were conducted. To determine use of talcum powder products, women were asked if they ever used talc at least once per month for 6 months or more.(6) If the response was positive, they were asked whether they had ever used talc in non-perineal areas (feet, arms, chest or back), perineal areas, or on underwear or sanitary pads/diaphragm. Questions on talc use included age at first use, frequency of use (times per month) and years of talc use. Use of genital talc for one year or more was associated with a statistically significant 46% increased risk for ovarian cancer (odds ratio 1.46, 95% CI 1.27-1.69). Similar relative risks were seen in non-Hispanic white, Hispanic, and African-American women. A dose-response analysis found that for each 5-year use of genital talc products, risk for ovarian cancer increased by a statistically significant 14% (95% CI 1.09-1.20).

Kurta *et al.* (2012)(4) published results of a population-based case-control study based in Western Pennsylvania, Eastern Ohio, and Western New York State. A total of 902 cases were enrolled, and 1,802 controls were randomly selected from the general population of those areas. Perineal talc use was defined as ever using dusting powder or deodorizing spray on the genital or rectal areas, on sanitary napkins, on underwear, or on diaphragms or cervical caps. Use of perineal talc increased risk for ovarian cancer by a statistically significant 40% (odds ratio 1.40, 95% CI 1.16–1.69).

Rosenblatt et al. (2011) (5) published results of a population case-control study set in western Washington that investigated the association between genital powder exposure and risk of ovarian cancer. A total of 812 women with ovarian cancer were identified through a population-based cancer registry and interviewed. A total of 1,313 controls were selected at random from the western Washington population. Sources of genital powder were ascertained, including direct perineal application, use on sanitary napkins and diaphragms, and use of deodorant vaginal spray. For powder use on sanitary napkins and use of vaginal deodorant sprays, the authors recorded the total number of months or years in which these products were used. For use of perineal powder, the investigators recorded the age began and ended, number of weeks or months of use per year, and average days per week used. Study participants were also asked about the types of powder used, including talcum, baby, cornstarch, deodorant, body/bath, and other or unknown. The authors then calculated the lifetime duration of use, and estimated lifetime number of applications. Perineal use of powder was associated with a non-statistically significant 27% increased risk for ovarian cancer (odds ratio 1.27, 95% CI 0.97-1.66). The risk for borderline ovarian tumors was statistically significantly raised by 55% (odds ratio, 1.55, 95% CI 1.02-2.37), whereas risk for invasive ovarian cancers was increased by a non-statistically significant 27% (odds ratio 1.27, 95% CI 0.87-1.58). Use of powder on either sanitary napkins or diaphragms did not increase risk. Use of vaginal deodorant spray increased risk by a non-statistically significant 15% (odds ratio 1.15, 95% CI 0.85-1.56). None of the dose-response or time variables (years of use, lifetime number of applications, age at first use, age at last use, calendar year of first use, time since first and last uses) showed evidence of increasing relative risk of ovarian cancer with increasing level of exposure to talcum powder products. Similarly, there was no evidence of increased risk for ovarian cancer with increasing dose of powder use on sanitary napkins, or of vaginal deodorant sprays. Use of perineal powder increased risk for mucinous borderline, serous borderline, endometrioid, and other non-mucinous ovarian cancers by 47% to 78%, but none of the odds ratios was statistically significant.

Wu *et al.* (2009) (6) presented results of a case-control study of ovarian cancer with 609 cases and 688 controls. Risk of ovarian cancer among users of talcum powder products in the perineal area was increased by 53% (odds ratio 1.53, 95% CI 1.13-2.09). Risk of serous ovarian cancer was also significantly elevated (odds ratio 1.70, 95% CI 1.27-2.28). A statistically significant trend to increased risk with lifetime numbers of applications was observed. Compared with no use, odds ratios for those with \leq 5200, >5200 - \leq 15,600, >15,600 - \leq 52,000, and > 52,000 applications were 1.2, 1.38, 1.34, and 1.99, respectively (p_{trend} = 0.0004).

Moorman *et al.* (2009) (7) published data from a population-based case-control study in White and Black women. In total, 1114 cases and 1086 controls were interviewed. They found no association of genital talcum powder product use and risk for ovarian cancer in Whites (odds ratio 1.04, 95% CI 0.82-1.33), and a non-statistically significant increased risk in Blacks (odds ratio 1.19, 95% CI 0.68-2.09). Neither dose-response nor effects by histologic subtype were addressed.

Merritt *et al.* (2008) (8) published results from an Australian-wide population-based case-control study on talcum powder products and risk of ovarian cancer. Included were 1,576 women with ovarian cancer and 1,509 population-based controls. Women provided information on self-administered questionnaires. They were asked if they had ever used powder or talc in the genital area, on underwear, or on sanitary pads or diaphragms. They were also asked about age at first use and years of talc use in these areas. Duration of talcum powder use prior to and after surgical sterilization was calculated, and all analyses were limited to the time when the fallopian tubes would have been patent. Use of talc elsewhere was also collected. Ever use of talc in the perineal region was associated with a statistically significant 17% increased risk for ovarian cancer (odds ratio 1.17, 95% 1.01-1.36). The increase was strongest for serous (odds ratio 1.21, 95% CI 1.03-1.44), but was also seen for endometrioid (odds ratio 1.18, 95% CI 0.81-1.70). A statistically significant dose-

response trend for years of perineal talcum powder use prior to surgical sterilization was seen for all cases combined (p=0.021) and for serous ovarian cancer (p=0.022). While not statistically significant, increasing years of use was associated with increased risk of mucinous and endometrioid ovarian cancers.

Mills *et al.* (2004) (9) reported on a population-based case-control study in 22 counties of Central California. A total of 256 cases were recruited from cancer registries and interviewed, and 1,122 population-based controls were randomly selected and interviewed. Women were asked the following about use of talcum powder: use in the genital area, years of use, frequency of use, and total duration of use. Ever use of perineal talc statistically significantly increased risk for ovarian cancer by 37% (odds ratio 1.37, 95% CI 1.02-1.85). There was a statistically significant trend found in the doseresponse analysis of frequency of use; women using talc 4-7 times per week had a 74% increased risk for ovarian cancer (p=0.015). There was an indication of trend with duration of use up to 4-12 years, although number of years beyond that did not increase risk further. A similar relationship was found for cumulative dose (frequency times duration). Risk of serous ovarian cancer was also statistically significantly elevated (odds ratio 1.77, 95% CI 1.12-2.81).

Ness *et al.* (2000) (10) recruited women with ovarian cancer ascertained from 39 hospitals in Eastern Pennsylvania, Southern New Jersey, and Delaware. A total of 767 cases of ovarian cancer were interviewed, along with 1,367 population-based controls. Women were asked if they ever used talc, baby, or deodorizing powder at least once per month for 6 or more months in their genital or rectal area, on sanitary napkins, on underwear, on a diaphragm or cervical cap, or on non-genital areas. They also were asked about male partner use of talc to the genital area or underwear. Compared with never-users, women who used talc in genital/rectal areas had a statistically significant 50% increased risk for ovarian cancer (odds ratio 1.5, 95% CI 1.1-2.0). Those who used it on sanitary napkins had a statistically significant 60% increased risk for ovarian cancer (odds ratio 1.6, 95% CI 1.1-2.3). Use on underwear increased risk by a statistically significant 70% (odds ratio 1.7, 95% CI 1.2-2.4). Use on a diaphragm/cervical cap or by a male partner did not increase risk. Among those who used in the genital/rectal or other body areas, there was no evidence of increasing risk with increasing numbers of years of use.

Cramer *et al.* (1999) (11) published results of a population-based case-control study with 563 cases of ovarian cancer and 523 controls. Risk of ovarian cancer among women with perineal talcum powder product exposure was increased 60% compared with non-exposed (odds ratio 1.6, 95% CI 1.18-2.15). Risk of invasive serous ovarian cancer was significantly increased (odds ratio 1.7, 95% CI 1.22-2.39). No dose-response effect, as defined by duration, was seen.

Wong et al. (1999)(12) conducted a hospital-based case-control study in Buffalo, NY, comparing 499 patients with ovarian cancer and 755 patients with non-gynecological malignancies. No details were given on how talcum powder product use was ascertained, but women were queried on site of talc use (sanitary napkin vs. genital/thigh area) and duration of use. Compared with non-users, those who used on sanitary napkins or genital/thigh areas had no increase in risk for ovarian cancer. Furthermore, there was no apparent trend toward greater risk with longer duration of use. Finally, there was a non-statistically significant 20% increased risk of serous ovarian cancer with talcum powder product use (odds ratio 1.2, 95% CI 0.7-2.1).

Godard *et al.* (1998)(13) studied risk of sporadic (101 cases) or familial (51 cases) ovarian cancer according to perineal talc use compared with 152 control in Montreal, Canada. Cases were diagnosed at one of two teaching hospitals; controls were randomly selected from the population. Talc use questions were not detailed in the paper, but the variable of "ever" versus "never" perineal use of talc was reported. Women who had ever used perineal talc had a 2.49 times greater risk of developing any ovarian cancer (relative risk 2.49, 95% CI 0.94-6.58, p=.066), which was marginally statistically significant. The relative risk for sporadic ovarian cancer was 2.45 (95% CI 0.85-7.07, p=0.098), and for familial ovarian cancer it was 3.25 (95% CI 0.85-12.4, p=.084).

Green *et al.* (1997)(14) included 824 Australian women with ovarian cancer who were identified through cancer registries, as well as 855 population-based controls. No details were provided on the specific questions posed regarding talc use, but perineal use was ascertained, as well as duration and ages/years used. Women who had ever used talc in

the perineal region had a statistically significant 30% increased risk for ovarian cancer (relative risk 1.3, 95% CI 1.1-1.6). The authors investigated whether a history of surgical sterilization affected this relative risk (the rationale being that women who are surgically sterilized would have lower chance of talc migrating up to the ovaries). They found that compared with women who had neither used talc nor had surgical sterilization, risk was highest among talc users without surgery (relative risk 1.3, 95% CI 1.0-1.7) and lowest among women with a history or tubal sterilization or hysterectomy who had not applied talc to the perineum (relative risk 0.6, 95% CI 0.5-0.84). No dose-response relationship by duration of use was found.

Cook et al. (1997) (15) reported on a population-based case-control study including 313 cases of ovarian cancer identified through a cancer registry and 422 population-based controls in Western Washington. Women were queried about storing diaphragms in powder, dusting perineal areas with powder after bathing, powdering sanitary napkins, and using genital deodorant sprays (which may contain aerosolized powder). Women were further asked about duration and frequency of powder application and about types of powder applied. There was a statistically significant 50% increase in risk of ovarian cancer associated with use of any of the genital powder applications (perineal application, sanitary napkins, genital deodorant sprays, diaphragms) (relative risk 1.5, 95% CI 1.1-2.0). The risk was highest, and statistically significant, in those women who dusted perineal areas with powder (relative risk 1.8, 95% CI 1.2-2.9). Compared with never users of genital deodorant sprays, women who used these products for 12 months or less had a relative risk for ovarian cancer of 1.5, while those who used them for more than 12 months had a relative risk of 2.7. Compared with never users of genital deodorant sprays, women who used 500 lifetime applications or less of genital deodorant sprays had a relative risk for ovarian cancer of 1.7, while those who used more than 500 applications had a relative risk of 2.6. Both of these dose-response trends were statistically significant (p < 0.05). None of the other types of perineal talcum powder product use showed trends to greater risk with greater estimated duration used or applications. The authors then categorized powders into specific types: cornstarch, talcum powder, baby powder, deodorant powder, and scented body/bath powder (assuming talcum powder was likely a constituent of the latter three as well). Exclusive use of cornstarch, or of deodorizing powder, was not associated with increased risk for ovarian cancer, but the numbers of cases were very small (5 and 9, respectively). Exclusive use of other types of powder increased risk between 20 and 60 percent, but the results were not statistically significant. Risk for serous ovarian cancers was statistically significantly increased by 70% in women who ever used any genital powder (relative risk 1.7, 95% CI 1.1-2.5). The relative risk for "other tumors" among ever users was 1.8 (95% CI 1.1-2.8), while risks for mucinous or endometrioid tumors were not increased in genital powder users.

Chang *et al.* (1997)(16) reported on the association between talcum powder product use and risk of ovarian cancer in a population-based case-control study in Ontario, Canada. A total of 450 patients with borderline or invasive ovarian cancer and 564 population controls were interviewed. Women were asked about regular talc use and type of talc used, as well about duration and frequency of use. Women were queried about regular application of talc to the perineum and about use of talc on sanitary napkins. Use of cornstarch on the perineum and sanitary napkins was also ascertained. Women with any regular talc exposure had a statistically significant 42% increased risk of developing ovarian cancer (odds ratio 1.42, 95% CI 1.08-1.86). Use of cornstarch was not associated with increased risk, although this was a very uncommon exposure in this study. Use of talc on sanitary napkins increased risk to a lesser degree (odds ratio 1.26, 95% CI 0.81-1.96), as did use of talc only in the perineal area (odds ratio 1.31, 95% CI 1.00-1.73). A dose-response trend was seen: per 10 years of use of talc to the perineal area, risk of ovarian cancer increased by 6% (odds ratio 1.06, 95% CI 0.99-1.14). Frequency of use per month, however, did not show a dose-response trend. Use before and after 1970 showed almost identical odds ratios. Risk was higher prior to tubal ligation/hysterectomy than after either procedure. Risk was increased for all types of ovarian cancer included (invasive, borderline, serous, mucinous, and endometrioid). Only for invasive cancer was the odds ratio statistically significant, likely due to the larger numbers of cases in that category.

Shushan *et al.* (1996)(17) published results of a population-based case-control study in Israel, looking at the association between talcum powder product use and risk of invasive or borderline ovarian cancer. A total of 200 cases, identified through a cancer registry, were interviewed, as were 408 controls selected randomly from the same population. Details

of the talcum powder product use on the standardized questionnaire were not provided. Women who reported using talc "moderate to a lot" versus "never or seldom" had twice the risk of developing ovarian cancer, and the result was statistically significant (odds ratio 2.0, p=0.04).

Purdie *et al.* (1995)(19) studied the association between talcum powder product use and ovarian cancer risk in 3 Australian states. Cases were recruited from registries at three oncology treatment centers, and controls were chosen randomly from the general population. The details of the interview items on talc were not provided. Women who used talc around the perineum or abdomen had a statistically significant 27% increased risk for ovarian cancer (odds ratio 1.27, 95% CI 1.04-1.54).

Cramer *et al.* (1995)(18) published results of two case-control studies, in which a total of 450 women diagnosed with ovarian cancer in Boston, MA area hospitals, and 454 controls selected from the general population, were interviewed. Use of talc "in genital hygiene" was associated with a 60% increased risk for ovarian cancer (odds ratio 1.6, 95% CI 1.2-2.1).

Tzonou *et al.* (1993)(28) conducted a hospital-based case-control study in Athens, which included 189 women with ovarian cancer and 200 hospital visitor controls. No information was provided on how talcum powder product use was ascertained, other than that women were interviewed about whether or not they used of talc in the perineal area. There was little evidence of an association: the relative risk for ovarian cancer in those who said "yes" versus "no" to perineal talc use was 1.05 (95% CI 0.28-3.98). However, only 6 cases and 7 controls reported using talc in the perineal area.

Rosenblatt *et al.* (1992)(20) published results of a hospital-based case-control from the Baltimore, MD area. A total of 77 cases of ovarian cancer and 46 controls, who were treated for non-gynecologic/non-malignant diseases, were included. Participants were interviewed about presence and length of genital fiber and respiratory fiber exposure. Fiber exposure was defined as exposure to asbestos, talc, and fiberglass. Dose of exposure was calculated as number of years of each type of genital or respiratory exposures from all sources, and only exposure prior to tubal ligation (for women who had that procedure) was counted. Use of genital talc was associated with a 70% increased risk (odds ratio 1.7, 95% CI 0.7-3.9). Use of talc on sanitary napkins resulted in almost a 5-fold statistically significant increase in risk of ovarian cancer (odds ratio 4.8, 95% CI 1.3-17.8). Talc use on diaphragms tripled risk for ovarian cancer (odds ratio 3.0, 95% CI 0.8-10.8). The odds ratios for these latter two exposures were not statistically significant. Women who had exposure years above the median had more than double the risk of ovarian cancer compared with women with lower exposure years (odds ratio 2.4, 95% CI 1.0-5.8).

Chen et al. (1992)(21) interviewed 112 women with ovarian cancer and 224 community controls in China. No information was provided about how women were asked about talcum powder product use prior to 3 years before diagnosis (for cases) and a comparable date in controls. Seven cases and 5 controls reported using "dusting powder" to the lower abdomen and perineum for 3 or more months, giving a relative risk of 3.9 (95% CI 0.9-10.6).

Harlow *et al.* (1992) (22) published a case-control study with 235 cases of ovarian cancer and 239 controls. The authors found a 50% increased risk of ovarian cancer in women who had ever versus never used talcum powder products in the perineal area with marginal statistical significance (odds ratio 1.5, 95% CI 1.00-2.1). Risk of serous cancer was similarly increased (odds ratio 1.4, 95% CI 0.9-2.2). Risk by number of lifetime applications indicated a dose response effect. Compared with no use, odds ratios for those with < 1000, 1000 - 10,000, and > 10,000 were 1.3, 1.5, and 1.8, respectively ($p_{trend} = 0.09$).

Booth *et al.* (1989) (23) reported on a hospital-based case-control study conducted in 15 hospitals in the UK. A total of 235 cases with ovarian cancer and 451 controls were interviewed and asked about monthly experiences from age 16 to 45 years. Frequency of exposure to perineal talc was ascertained. Compared with never-users, women who used genital talc rarely, monthly, weekly, and daily, respectively, had relative risks for ovarian cancer of 0.9, 0.7, 2.0, and 1.3,

respectively, and the trend was statistically significant (p=0.05). Cases and controls did not differ by percentage who stored diaphragms in talc.

Harlow *et al.* (1989)(24) interviewed 116 women with serous or mucinous borderline ovarian cancer identified through a Western Washington population-based cancer registry, as well a population-based sample of 158 control women. The authors used an open-ended question asking women to specify the types of powder they used for perineal application after bathing, on sanitary napkins, and on diaphragms. Powder was categorized as baby, deodorizing, other/unspecified talcum, or cornstarch. There was no association between perineal use in general and risk for borderline ovarian cancer, but women who reported using powder on sanitary napkins had a relative risk of 2.2 (95% CI 0.8-19.8) compared with nonusers. Women who used deodorizing powders had a statistically significant relative risk of 2.8 (95%CI 1.1-11.7). No data were presented on frequency or duration of use.

Whittemore *et al.* (1988)(25) included 188 ovarian cancer cases (identified through 7 hospitals in the San Francisco, CA area, and 539 controls (of which approximately half were hospital controls and half were population-based controls). Women were asked whether they had ever use talcum powder on the perineum, on sanitary pads, or on diaphragms, and about frequency and duration of use. Women who reported using talcum powder to the perineum had a non-statistically significant 45% increased risk for ovarian cancer (relative risk 1.45, 95% CI 0.81-2.60). Use on sanitary pads was associated with a non-statistically significant 38% reduced risk, and use on diaphragms was associated with a non-statistically significant 50% increased risk. The relative risk for ovarian cancer increased with increasing applications of talc per month; relative to nonusers, the relative risk for 1-20 times per month was 1.27, and the relative risk for 20 or more times per month was 1.45. None of these values was statistically significant. The increased relative risk was apparent for women who had never had tubal ligation or hysterectomy, but not for women who had had one of these procedures. Compared with non-users, women with 1-9 years of use had a relative risk of 1.6 (95% CI 1.00-2.57), but women with greater years of use had only a relative risk of 1.11 (95% CI 0.74-1.65).

Hartge *et al.* (1983)(26) provided a brief report on a small hospital based case-control study of ovarian cancer, which included 135 cases and 171 controls from the Washington, DC area. No information was provided on how the talc exposure was ascertained. The authors found that women who reported genital talc use had a relative risk of 2.5 compared with never users (95% CI 0.70-10.0), but this analysis was based on only 7 cases and 3 controls.

Cramer *et al.* (1982) (27) published the first study to look at the association between talcum powder product use and risk of ovarian cancer. This population-based study found an odds ratio of 1.92 (95% CI 1.27-2.89) for ever use of perineal talcum powder products in the perineal area. Dose-response was not addressed.

Summary of Case-control Studies

These 28 case-control studies included population-based and hospital-based studies from a diverse geographic area across the U.S., as well as Australia, Canada, the UK, Israel, Greece, and China. Sample sizes ranged from 77 to 2041 cases, with comparable numbers of controls. Of the 28 studies, 24 found odds ratio greater than 1.1 for ovarian cancer in women who had any perineal exposure to talcum powder products, compared with never users(1-6, 8-11, 13-23, 25-27). Of these 24 odds ratio estimates, 16 were statistically significant (95% confidence intervals excluded 1.0 or p value \leq 0.05)(1-4, 6, 8-11, 14-19, 27). Among the 8 studies which were not statistically significant, 7 had a sample size lower than that estimated to be needed to have power to detect a statistically significant result(13, 20-23, 25, 26). It is important to note that while the 8 studies did not have statistically significant results, they provide relevant data because their relative risk estimates were consistent with the 16 studies that showed statistically significant results.(50)

Both population-based and hospital-based studies were represented in the literature on use of talcum powder products and risk of ovarian cancer, and odds ratios/relative risks were similar across the two classes of studies. Earlier studies were less likely to address dose-response relationships, or to investigate effects of talcum powder product use on

specific histologic subtypes of ovarian cancer. Most studies were limited to white women; later studies included larger numbers of Black women as well as Asian and Latina women.

The larger, and more recent studies, however, added important information on dose-response relationships and on risk of particular histologic subtypes of ovarian cancer. Many of the 28 studies found evidence of a dose-response effect(1-3, 6, 8, 11, 20, 22, 23, 25). Most often, this took the form of lifetime numbers of applications of talcum powder products or years of use. The later studies determined that some risk of some subtypes, particularly serous ovarian cancer, were more highly related to use of talcum powder products.

Taken together, the case-control studies, conducted over 40 years, provide consistent and replicated evidence of increased risk of ovarian cancer with perineal exposure to talcum powder products, with evidence of a dose-response. They support the conclusion that talcum powder products can cause ovarian cancer.

Prospective Cohort Studies

The Sisters' Study

The Sisters' Study cohort analysis included 135 cases of women with ovarian cancer, 7 cases of fallopian tube cancer, 4 cases of peritoneal cancer, and 8 cases with unknown primary site. (30) Of the total 154 cases, only 96 were confirmed by medical records or death certificate. Women were recruited to the cohort from across the United States from 2003-2009. An analysis of talcum powder products use and ovarian cancer risk, published in 2016, included 41,654 women who reported having at least one ovary and no history of ovarian cancer at study entry, from among 50,884 women aged 35-74 years at study enrollment with at least one sister who had been diagnosed with breast cancer.

Talcum powder products use for the 12 months prior to study entry was ascertained by self-administered questionnaires. Questions included frequency of genital talcum powder products use in the form of powder or spray applied to a sanitary napkin, underwear, diaphragm, cervical cap, or vaginal area. Response categories were: did not use, used less than once a month, used 1-3 times/month, used 1-5 times/week, or used more than 5 times/week. Only a dichotomous variable—use/nonuse—was used in the analysis. Ovarian cancer cases were identified by yearly follow-up questionnaires; no updates on talc use were included. The median follow-up of study participants was only 6.6 years.

Contrary to all of the other epidemiologic studies, perineal talc use was associated with a non-statistically significant 27% decreased risk of developing ovarian cancer (hazard ratio 0.73, 95% CI 0.44 - 1.2). Of note, the 95% CI's included 1.2, so the true relative risk in this cohort could have been in the range of the other studies. Use of talcum powder products during ages 10-13 years showed a non-statistically significant 10% increase in risk (hazard ratio 1.1, 95% CI 0.74, 1.7). No data on risk by ovarian cancer subtype were presented.

Women's Health Initiative

In 2014, a report on the use of perineal powder in relation to ovarian cancer risk was published, using a total of 429 cases of women with ovarian cancer from the Women's Health Initiative cohort study. (29) Women were aged 50-79 years at study entry, and were recruited from 40 clinical centers across the United States between 1993-1998. While over 93,000 women were enrolled in the Women's Health Initiative cohort, this analysis included only 61,576. The largest number, 20,960, were excluded because they reported previously having had both ovaries removed or did not know whether they had any ovaries at the time of enrollment. Also excluded were 10,622 women with a history of any invasive cancer at enrollment. A further 516 were missing follow-up information. At study entry, women reported use of perineal powder on self-administered standardized questionnaires, in which they were asked if they had ever used powder on their genital areas. Those who responded yes were then asked to indicate if they used them for less than 1 year, 1-4 years, 5-9 years, or 20 or more years. Women who reported ever using a diaphragm were asked if they used powder on the diaphragm, and for what duration. Women were also asked if they used powder on a sanitary

napkin/pad, again with questions about duration. Because of the relatively small number of ovarian cancer cases (429) that occurred during the study, the investigators combined the duration categories into never, 9 years or less, or 10 years or more. The investigators then created one variable by combining the perineal use, diaphragm use, and sanitary napkin use, with duration as the maximum duration for any of the 3 application areas. Cases of ovarian cancer were identified by participants on annual follow-up questionnaires; no updates on talc use were included. Medical records and pathology reports were requested for each self-reported case and were adjudicated by clinic physicians and central cancer adjudicators. A total of 429 cases were included in the analysis.

Ever use of perineal powder was associated with a non-statistically significant 6% increased risk of ovarian cancer compared with never use (hazard ratio 1.06, 95% confidence interval 0.87 - 1.28). Risk of serous invasive cancer was increased by a non-statistically significant 13% (hazard ratio 1.13, 95% CI 0.84 - 1.51). Both of these results, while not statistically significant, are consistent with an association between talcum powder product use and risk of ovarian cancer overall and of serous ovarian cancer.

Nurses' Health Study

The Nurses' Health Study is a cohort established in 1976 that had 307 cases of ovarian cancer at its initial publication in 2000; further data with a total of 210 cases were published in 2008; and an unknown number of cases were analyzed for publication in 2010. The study initially enrolled 121,700 registered nurses between the ages of 30-55 years from across the United States. Use of talcum powder was ascertained on the self-administered 1982 questionnaire only, by asking women if they had ever commonly used talcum, baby powder, or deodorizing powder on their perineal areas. Possible responses were: no, daily, 1-6 times per week, or less than once per week. Women were also asked if they had applied these products to sanitary napkins. "Ever talc use" was classified as ever talc use on either the perineal area or sanitary napkins. Every two years, participants reported health updates; no updates on talc use were included, but self-reported cases of ovarian cancer were adjudicated through medical record reviews. Women were excluded from talcum powder products analyses if they did not complete the information on the 1982 questionnaire, if they reported having had both ovaries removed, if they had had a hysterectomy but did not report whether or not they had at least one ovary remaining, or if they had a history of radiation therapy.

There have been three publications from the Nurses' Health Study on the relationship between talcum powder products and risk for ovarian cancer.(31-33) The first, published in 2000, included 78,630 women, of whom 307 cases of ovarian cancer were diagnosed during a 14 year follow-up period. Ever use of talc was reported by 40.4% of the cohort; 14.5% ever used talc daily.(31)

The risk of ovarian cancer was not statistically significantly associated with epithelial ovarian cancer overall (relative risk 1.09, 95% CI 0.86-1.37), and risk did not increase with increasing frequency of use. Risk of serous ovarian cancer, however, was statistically significantly increased by 40% in women who had ever used talc (relative risk 1.4, 95% CI 1.02-1.91).

The second report from the Nurses' Health Study was in 2008.(32) In this study, 210 cases and a random sample of 600 controls from the Nurses' Health Study were combined with cases and controls from other case-control studies. Among the Nurses' Health Study cases and controls, the relative risk for ovarian cancer was 1.24 (95% CI 0.83-1.83).

Daily use was associated with a 44% increase in risk (relative risk 1.44, 95% CI 0.88-2.37), although neither association was statistically significant. Given that only 210 Nurses' Health Study cases were included, the lack of statistical significance is likely due to this insufficient sample size.

The third Nurses' Health Study report was published in 2010.(33) This report looked at multiple menstrual, hormonal, health habits, and familial risk factors for ovarian cancer; the variable on use of talc to the perineal area was limited to a dichotomous "greater than or equal to once per week vs. less than once per week)".

Use of talc one or more times per week compared with less use was not statistically significantly related to risk for epithelial ovarian cancer (relative risk 1.06, 95% CI 0.89-1.28), serous invasive (relative risk 1.06, 95% CI 0.84-1.35), or for other subtypes including endometrioid, or mucinous ovarian cancer.

It is difficult to compare the results of these three Nurses' Health Study publications. The first and third used different categories of use as the referent (comparison) group. The first publication used "never use" as the comparison and found a statistically significant effect for risk of serous ovarian cancer with any use of talcum powder products. The third publication combined "never use" and "less than once per week" into one referent category. If low frequency use increases risk of ovarian cancer, which is entirely plausible, combining such women with never users will seriously underestimate the true relative risk associated with use of talcum powder products. The second publication found increased risks of total and serous ovarian cancer with use of talcum powder products, but the numbers were small and therefore the results were not statistically significant.

Cohort Studies Analysis

Two of the three cohort studies found small increases in risk of ovarian cancer overall among women who used talcum powder products in the perineal areas. The results were not statistically significant for ovarian cancer overall, however, likely due to insufficient sample size or incomplete ascertainment of talc exposure. The first Nurses' Health Study publication found a statistically significant association between ever versus never use and risk of serous ovarian cancer. The Sisters' Study found a reduced risk of ovarian cancer but did not report data by histologic subtype of ovarian cancer. Similar to the Nurses' Health Study, the Women's Health Initiative found an increase, albeit non-statistically significant, in risk of serous ovarian cancer in users versus nonusers of talcum powder products.

There were serious limitations to these cohort study analyses. None of the studies were specifically designed to investigate the relationship of talcum powder product use and risk of ovarian cancer. Rather, the cohorts were designed to study a large number of outcomes and a wide variety of exposures. Thus, none of the studies obtained detailed lifetime histories of talcum powder product use, although two did ask about duration of use for current users. None, therefore, was able to accurately measure dose of exposure. The sample sizes (numbers of cases) of most of the cohort study publications were likely too small to be able to detect a relative risk in the order of 1.24 (the value found in the Terry pooled analysis(39)) with reasonable power, especially for different histologic subtypes.

To assess likelihood of inadequate sample sizes in these cohort studies, I used an online calculator: http://www.openepi.com/SampleSize/SSCohort.htm. I used WHI data(29) to estimate the cohort sizes needed to determine a true relative risk of 1.24 (i.e. the relative risk from Terry et al pooled analysis(39)) with 50% exposure to talcum powder products in non-cases, and an assumption of 0.5% occurrence of ovarian cancer in unexposed women(66) over 12 years' follow-up (the mean number of years of follow-up in the WHI publication). My calculations show that to have sufficient power to identify a statistically significant relative risk of 1.24, the necessary cohort size would be over 140,000. None of the 3 cohorts had this large a sample size for these publications. Sample size ultimately rests on the numbers of cases that occur, rather than the actual cohort size. While the third Nurses' Health Study publication(33)—had a large sample size of cases, the authors' choice to combine never users with less than once per week users could have significantly attenuated the relative risk estimates.

Results of the cohort studies were overall attenuated compared with results of the case-control studies. However, the trend for 2 of the 3 studies was a positive relative risk of talcum powder product use and risk of ovarian cancer. In the Nurses' Health Study, women who used these products had a statistically significant 40% increased risk of developing serous invasive ovarian cancer compared with non-users.(31) In that study, use in the perineal area directly or on sanitary napkins increased risk of ovarian cancer overall by a non-statistically significant 15%.

In the Women's Health Initiative, use of talcum powder products to the genital area (or on sanitary napkins or diaphragm) increased risk overall by a non-statistically significant 6%, and risk of serous invasive ovarian cancer by a non-statistically significant 13%.

The Sisters Study asked only about use of talcum powder product use in the 12 months prior to enrollment; just 14% of the cohort used these products in that period. The cohort included only women at high risk for breast cancer recruited beginning in 2003—this may have been a group of women who were aware of the potential carcinogenic effect of talc, and therefore avoided use. This cohort study found a non-statistically significant 27% lower risk of developing ovarian cancer in users versus non-users. Given the likely 30-50-year latency of ovarian cancer development after exposure to a carcinogen(67), however, these results of the Sisters' Study are not likely reflective of risk from exposure to talcum powder products.

It is important to note that the effect sizes in the Nurses' study and in the Women's Health Initiative were in the same direction as seen in virtually all of the case-control studies.

Therefore, the attenuated results from these cohort studies do not reduce my confidence in the observations from the 28 case-control studies described above.

In summary, while the cohort studies on average showed more attenuated relative risks of ovarian cancer in relation to use of talcum powder product use, their results as a group do not negate the significant case-control study findings and the significant results of the meta-analyses and the pooled analysis.

Meta-Analyses and Pooled Analyses

I reviewed 7 meta-analyses (11, 22, 34-38) and one pooled analysis (39). All of the meta-analyses, and the pooled analysis, found summary elevated risks for ovarian cancer associated with use of talcum powder products. These elevated relative risks were statistically significant. Although many of the source studies from which they performed their meta-analyses had elevated risks for ovarian cancer with use of talcum powder products, the relative risks or odds ratios were not all statistically significant. I interpret the lack of statistical significance in some source studies as being due to the small sample sizes of many of these studies. I calculated the sample size required for a study in which 40% of controls used talcum powder products, in which there is good power (80%) to detect a relative risk of 1.3, and that had low chance of estimated a particular relative risk by chance (http://www.openepi.com/SampleSize/SSCC.htm). The calculation showed that the minimum number of cases and controls would need to be 931 each, for a total sample size of 1862. Almost none of the case-control or cohort studies had sample sizes this large. Lack of statistical significance found in the various studies is likely due to their small sample sizes. For this reason, evaluation of the meta-analyses and pooled analysis, with their larger sample sizes, is critical to understanding the state of epidemiologic evidence linking use of talcum powder products to risk of ovarian cancer.

Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-analysis (R. Penninkilampi, Eslick GD, 2018)

In this, most recent, meta-analysis and systematic review, the authors searched 6 electronic databases, and selected observational studies with at least 50 cases of ovarian cancer. (34) They analyzed the association between ovarian cancer, including specific sub-types, and the following variables regarding talcum powder products: any perineal talc use, long-term (> 10 years) use, total lifetime applications, and use on diaphragms or sanitary napkins. Included were 24 case-control studies, with 13,421 ovarian cancer cases. Also included were three cohort studies, with 890 cases and a comparison of 181,860 person-years [numbers of non-cases multiplied by the years of follow-up]).

The authors found that any perineal talc use was associated with a statistically significant 31% increased risk for ovarian cancer (odds ratio 1.31, 95% CI 1.24-1.39).

There was evidence of a dose-response effect by number of lifetime applications. Women whose lifetime applications totaled less than 3600 had a statistically significant 32% increased risk of developing ovarian cancer (odds ratio 1.32, 95% CI 1.15-1.50), while those whose lifetime applications totaled over 3600 had a statistically significant 42% increased risk for ovarian cancer (odds ratio 1.42, 95% CI 1.25-1.61).

Increased risks were seen for all types of ovarian cancer, as well as specific subtypes: all serous (odds ratio 1.32, 95% CI 1.22-1.43), serous invasive (odds ratio 1.32, 95% CI 1.13-1.54), serous borderline (odds ratio 1.39, 95% CI 1.09-1.78), and endometrioid (odds ratio 1.35, 95% CI 1.14-1.6). For all of these subtypes, the confidence intervals did not include 1.0, and therefore are considered statistically significant and unlikely to be due to chance findings. For other subtypes, the following non-statistically significant associations were seen: all mucinous (odds ratio 1.12), mucinous invasive (odds ratio 1.34), mucinous borderline (odds ratio 1.18), and clear cell (odds ratio 1.02).

The association between ever use of talc and overall ovarian cancer risk was higher in case-control studies (odds ratio 1.35, 95% CI 1.27-1.43) than in cohort studies (odds ratio 1.06, 95% CI 0.90-1.25). However, the results for case-control and cohort studies were similar for serous ovarian cancer. In cohort studies, risk for serous invasive cancer was statistically significantly increased by 25% with any perineal talc use (odds ratio 1.25, 95% CI 1.01-1.55), and in case-control studies, it was statistically significantly increased by 36% (odds ratio 1.05-1.75). There was insufficient information from the cohort studies to calculate the dose-response variable (total lifetime applications).

In my opinion, the results of this 2018 meta-analysis give strong support for an association between perineal talcum powder product use and risk for ovarian cancer. A significant number of the aspects of the causal relationship that Bradford Hill describes in his address are present in these data, including strength, consistency, temporality, and biologic gradient. Bradford Hill did not define his first aspect—strength—other than to say that the likelihood of causality is greater if the agent causes a "several fold higher" increase in risk in exposed persons. However, for agents like perineal talcum powder products that have such high prevalence of use (over 50% in some populations), the odds ratio/relative risk/hazard ratio for perineal talc use is of great importance for both public health and clinical medicine because it means that perineal talc use causes a significant number of ovarian cancer cases every year.

The corollary example of combined estrogen plus progesterone menopausal hormone therapy and breast cancer risk is helpful here. The Women's Health Initiative clinical trial showed that this type of hormone therapy increases risk of breast cancer by 26% after an average 5 years of use. That level of risk was sufficient for clinical interest groups and governmental agencies to advise women to use hormone therapy for limited periods of time, if at all, because of risk for breast cancer and other adverse events with similar levels of increased risk (29% increase in coronary heart disease, and 41% increase in stroke).(55) Further examples of relative risks less than 1.5 that have significant public health impact because of high prevalence of exposure in the population or in specific subgroups are shown on pages 26-27.

Genital Use of Talc and Risk of Ovarian Cancer: A Meta-Analysis (Berge W, Mundt K, Luu H, Boffetta P, 2017)

The authors of this meta-analysis performed a systematic search of PubMed, Embase, and Scopus databases (35). After quality assurance and redundancy checks, they included in their analysis 24 case-control studies and 3 cohort studies that reported on the association between talcum powder products and risk of developing ovarian cancer. The main meta-analysis compared ever versus never use of genital talc. Additional analyses looked at use of powder on sanitary napkins and diaphragms. Stratified analyses were conducted for tumor types.

From the meta-analysis, the authors observed a statistically significant 22% increased risk of developing ovarian cancer in women who had ever used genital talc versus never users (relative risk 1.22, 95% CI 1.13-1.30).

Significant results were found for dose-response relationships, both for number of years of use and for number of applications. Each 10-year increase in genital talc use was associated with a 16% increase in risk for developing ovarian

cancer (relative risk 1.16, 95% CI 1.07-1.26). Furthermore, each increase of one application per week was associated with a 5% increase in risk (relative risk 1.05, 95% CI 1.04-1.07).

Risk of serous carcinoma was the only subtype of ovarian cancer for which risk was elevated, and it was statistically significant (relative risk 1.24, 95% CI 1.15-1.34). "Late" exposure, which the authors hypothesized could be less likely to include asbestos, conferred a higher risk (relative risk 1.31, 95% CI 1.03-1.61) than did "early" exposure (relative risk 1.18, 95% 0.99-1.37). Neither specific use on a sanitary napkin nor on a diaphragm increased risk. Ever use of genital talc on a diaphragm was associated with decreased risk (relative risk 0.75, 95% CI 0.63-0.88).

The association of talcum powder use with increased risk of ovarian cancer was seen in case-control studies (relative risk 1.26, 95% confidence interval 1.17-1.35) but not in cohort studies (relative risk 1.02, 95% confidence interval 0.85-1.2). Furthermore, hospital-based case-control studies had a higher summary relative risk compared with population-based case-control studies (relative risks 1.34 and 1.24, respectively, both statistically significant).

In my opinion, the results of this meta-analysis are very similar to those of the later one described above, and further support the causal effect on ovarian cancer of talcum powder products applied in the perineal area.

Perineal Use of Talc and Risk of Ovarian Cancer (Langseth, Hankinson, Siemiatycki, Weiderpass, 2017)

In a meta-analysis conducted by some of the researchers who had investigated the epidemiologic research on talc exposure and ovarian cancer risk for IARC, data from 20 case-control studies were combined into a meta-analysis.(36) The authors found an overall odds ratio of 1.35 (95% CI 1.26-1.46) for ever- versus never-use of talcum powder products. The authors did not perform dose-response analyses.

Perineal Application of Cosmetic Talc and Risk of Invasive Epithelial Ovarian Cancer: A Meta-analysis of 11,933 Subjects from Sixteen Observational Studies. (Huncharek, Geschwind, Kupelnick, 2003)

This meta-analysis included fifteen case-control and two cohort studies that had been published between 1966 and early 2001, and that fit eligibility criteria, including documenting type of talc exposure (e.g. dusting perineum vs. sanitary napkins). The meta-analysis produced a statistically significant relative risk of 1.33 (95% confidence intervals 1.16-1.45) for ever versus never use of talc in the perineal area.(37)

The investigators addressed dose-response in the seven studies with information on years of talc exposure or numbers of talc applications per month. However, the authors combined categories of dose (applications per month) and duration of use (years) into one variable, and treated the dose-response analysis as if dose and duration were measuring the same construct. Their statement of lack of dose-response effect, therefore, is misleading in my opinion. The authors suggest that perhaps talc use has a similar carcinogenic effect as asbestos, and cites research showing that asbestos does not show a clear dose-response effect on risk of mesothelioma.

The authors also separated the results of hospital-based (e.g. both cases and controls from the same hospitals) from non-hospital-based (controls selected from the general population) and found a lower relative risk for ovarian cancer (1.19, not statistically significant) for the hospital-based studies and 1.38 (statistically significant) for population-based studies. The authors state that the hospital-based studies would be more accurate because they eliminate bias from case referral patterns to particular hospitals. However, many of the non-hospital-based studies used population-based case ascertainment (e.g. cancer registries) and selected population-based controls, which also eliminates the potential bias of hospital referral patterns.

Genital Talc Exposure and Risk of Ovarian Cancer (Cramer, Liberman, Titus-Ernstoff, Welch, Greenberg, Baron, Harlow, 1999)

In a paper that presented data for a case-control study of genital talc exposure and risk of ovarian cancer, Cramer et al. presented results of a meta-analysis of previous publications on the relationship between talcum powder product use and risk of ovarian cancer.(11) The authors included results from 14 case-control studies, from which they found a statistically significant combined odds ratio of 1.36 (95% confidence interval 1.24-1.49).

A Meta-Analytical Approach Examining the Potential Relationship between Talc Exposure and Ovarian Cancer (Gross and Berg, 1995)

In a meta-analysis sponsored by the Johnson and Johnson company, Gross and Berg included nine case-control and one cohort study in a meta-analysis, and found that the relative risk for women "exposed" versus "non-exposed" to talc was a statistically significant 1.27 (95% confidence interval 1.09-1.48).(38) Eliminating studies that included non-epithelial ovarian tumors, and studies that did not adjust for potential confounders, the relative risk remained statistically significant (relative risk 1.29, 95% confidence interval 1.02-1.63).

Perineal Exposure to Talc and Ovarian Cancer Risk (Harlow, Cramer, Bell, Welch, 1992)

Harlow and colleagues presented results of a meta-analysis of previous publications on the relationship between talcum powder product use and risk of ovarian cancer (in the same paper in which they presented data on a case-control study of ovarian cancer risk in relation to perineal talcum powder product exposure).(22) The authors included results from 6 case-control studies, from which they found a statistically significant combined odds ratio of 1.3 (95% confidence interval 1.1-1.6).

Genital Powder Use and Risk of Ovarian Cancer: A Pooled Analysis of 8,525 Cases and 9,859 Controls (Terry KL et al., 2013)

This pooled analysis used resources and data from the Ovarian Cancer Association Consortium, including 8 population-based case-control studies with relevant data on talcum powder product use.(39) Six of the studies were conducted in the U.S.(5, 7, 11, 68-70), one in Australia(8), and one in Canada(16). The analysis included 8,525 cases of ovarian, fallopian tube, or peritoneal cancer and 9,859 controls selected from the general population. Five of the studies had previously reported on use of talcum powder product and risk for ovarian cancer (5, 7, 8, 11, 16). To harmonize data on genital powder use across the studies, Terry *et al.* defined genital powder use as any type of powder (talc, baby, deodorizing, cornstarch, or unspecified/unknown) applied directly or indirectly (by application to sanitary pads, tampons, or underwear) to the genital, perineal, or rectal area. Study-specific powder questions varied in detail about type and method of application. However, the authors were able to classify women into those who "ever used" genital powders vs. those who "never used" powders in the genital area. The included studies also had extensive data on other suspected risk factors for ovarian cancer that were adjusted for in the analyses. To measure cumulative dose of genital powder use, the authors estimated lifetime number of powder applications by multiplying total months of use by frequency of use per month.

Genital powder use was reported by 25% of controls and 31% of cases. In the pooled analysis, ever use of genital powder was associated with a statistically significant 24% increased risk of ovarian cancer (odds ratio 1.24, 95% CI 1.15-1.33) versus women who never used these products. In contrast, women who had used powders only in non-genital areas had no increase in risk for ovarian cancer. Risk for several subtypes of ovarian cancer was statistically significantly increased in women who had used genital powders. Risk for invasive serous cancer was increased by 24% (1,952 cases; odds ratio 1.24, 95% CI 1.13-1.35). Risk for endometroid cancer was increased by 20% (568 cases; odds ratio 1.2, 95% CI 1.04-1.52). Risk of

serous borderline cancer was increased by 45% (odds ratio 1.45, 95% CI 1.24-1.69). Risk of mucinous cell invasive cancer and mucinous cell borderline cancer were not statistically significantly associated with use of genital powder products (206 cases; odds ratios 1.06, 95% CI 0.82-1.26; and 409 cases; 1.19, 95% CI 0.98-1.43, respectively).

There was a striking similarity in findings across studies, and the statistical test for heterogeneity was not significant (p > 0.61). All but one study showed odds ratios greater than 1.0, of which 5 were statistically significant (i.e., the confidence intervals did not contain 1.0).

To assess dose-response effects, the authors categorized participants who had used genital powder into 4 equal groups by lowest to highest level of use (quartiles), and compared their risk for ovarian cancer to that in non-users. A clear dose-response trend was evident. Compared with never users of genital powder, women in quartile 1 had a 14% increased risk for ovarian cancer (odds ratio 1.14, 95% CI 1.00-1.31), women in quartile 2 had a 23% increased risk for ovarian cancer (odds ratio 1.23, 95% CI 1.08-1.41), women in quartile 3 had a 22% increased risk for ovarian cancer (odds ratio 1.22, 95% CI 1.07-1.40), and women in quartile 4 had a 32% increased risk for ovarian cancer (odds ratio 1.32, 95% CI 1.16-1.52). Slightly higher odds ratios were seen when the cancers were restricted to non-mucinous subtypes (i.e., serous invasive, endometroid invasive, clear cell invasive, and serous invasive): 1.18, 1.22, 1.22, and 1.37, respectively, for increasing levels of use by quartiles. When all 5 categories were included, the trend was highly statistically significant (p_{trend} < 0.0001).

The authors performed some additional analyses to make sure that the results were not biased. First, they excluded cases and controls who only began to use genital powders after undergoing tubal ligation or hysterectomy (after which powder likely would not migrate to the ovaries). This had no effect on the odds ratios—the increased risks for ovarian cancer remained virtually identical in each quartile. They then looked at effect of genital powder use and ovarian cancer risk by subgroups of women according to other ovarian cancer risk factors. They found no significant interactions between genital powder use and parity, reported history of endometriosis, tubal ligation/hysterectomy, or menopausal status. They did find that the effect of genital powder use was higher in normal/overweight women (odds ratio 1.28, 95% CI 1.17-1.39) than it was in women with obesity (odds ratio 1.14, 95% CI 0.98-1.32).

Finally, the authors looked at associations between genital powder use and ovarian cancer by years of beginning use. They found that the association between genital powder use and ovarian cancer risk was similar for women who started use between 1952 and 1961 (odds ratio 1.36, 95% CI 1.19–1.56), between 1962 and 1972 (odds ratio 1.27, 95% CI 1.11–1.46), and after 1972 (odds ratio 1.31 95% CI 1.15–1.51). However, they observed an attenuated association for women who started genital powder use before 1952 (odds ratio 1.08, 95% CI 0.93–1.25).

The Terry *et al.* pooled analysis provides strong evidence that perineal talcum powder product use causes ovarian cancer. "Strong" here does not pertain to size of the odds ratio/relative risk. Rather, it refers to the fact that the number of cases included was larger than any previous study, the 8 case-control studies included showed similar effect sizes for association of genital powder use and ovarian cancer risk (consistency), the dose-response effect was clear, and there were enough numbers of cases to determine effects on subtypes of ovarian cancer.

Summary of Meta-analyses/Pooled Analysis Results

All of the meta-analyses and the pooled analysis demonstrate increased risk of ovarian cancer in women who used talcum powder products in the genital or perineal area compared with nonusers. The earlier meta-analyses included fewer studies, primarily case-control studies. The most recent meta-analyses included three cohort studies and 24 case-control studies. (34, 35) The summary relative risks were quite consistent across the meta-analyses and the pooled analysis, ranging from 1.22 to 1.4 for any versus no use of perineal talcum powder products. Furthermore, all of the summary results were statistically significant. Importantly, the later meta-analyses (34, 35) and the pooled analysis (39) assessed dose-response relationships, while earlier meta-analyses did not (11, 22, 36), or did so inaccurately (37). These

findings of increased risk of ovarian cancer with perineal exposure to talcum powder products shows that the observed associations overall and those for dose-response are robust.

One striking observation across the meta-analyses and pooled analysis is that the total sample sizes (numbers of cases) in all of the meta-analyses and the pooled analysis were sufficient to detect statistically significant relative risks of 1.3 for an overall "exposed" versus "non-exposed" variable with prevalence of 40 percent (see page 48 for a calculation of needed sample size). The numbers of cases in the meta-analyses and pooled analysis ranged from 1106 to 14,311, with controls of equal or greater number. All of these, therefore exceed the sample size I estimated that is needed to have statistical power to determine relative risks of 1.3. In contrast, many of the individual case-control or cohort studies did not have large enough samples of cases to have statistical power to determine a relative risk of 1.3.

Asbestos, Fibrous Talc, and Heavy Metals in Talcum Powder Products

It is important to note that talc is not asbestos-free. Talcum powder products contain other, potentially carcinogenic substances; of greatest concern is the presence of asbestos in talc, and the presence of talc with asbestiform fibers (fibrous talc), in these products. The presence of any one of these constituents add to evidence of biologic plausibility that would support the consistent increased risk seen in the epidemiologic studies.

Asbestos can take several forms. Proven carcinogenic forms include serpentine (chrysotile) and amphibole (actinolite, amosite, anthophyllite, crocidolite, and tremolite) minerals.(40) Both serpentine and amphibole asbestos forms are classified by IARC as Class 1 carcinogens(40). In their 2012 report, IARC stated that talc deposits may include tremolite, anthophyllite, and actinolite forms of asbestos(40).

Talc may form true mineral fibers that are asbestiform in habit. This form of talc is also referred to as fibrous talc and classified by IARC as a Class 1 human carcinogen(40). The IARC report also noted that "talc containing asbestiform fibers" is not the same as "talc contaminated by asbestos" (40). The conclusions reached in the 100c monograph about asbestos apply to fibrous talc (40). IARC has classified platy (non-fibrous) talc as a 2B "possible" carcinogen(42).

The primary route of exposure to asbestos is respiratory in the general population, although exposure through drinking water and exposure to hair or clothing of asbestos workers has also occurred (40). For talc, the primary exposures listed by the IARC report are respiratory and perineal (40).

Asbestos has been established as a cause of several types of cancer including epithelial ovarian cancer (40, 41). In order to assess the causal relationship between asbestos and ovarian cancer, I conducted a literature search. My search yielded a total of 26 studies that have investigated the epidemiology of asbestos exposure and risk of ovarian cancer. Two of these were meta-analyses, both published in 2011.(71, 72) One was a pooled analysis of 43 Italian cohorts with high asbestos exposure. (73) In addition, IARC published monographs on the carcinogenic role of asbestos, and conducted a systematic review through 2009 of asbestos and risk of ovarian cancer. (40, 41, 74) IARC concluded that asbestos, fibrous talc, chromium, and nickel are Group 1 human carcinogens.(40) IARC also classified cobalt as a 2B "possible" carcinogen.

Published data as recently as 2014 have shown that present-day talcum powder products include several types of asbestos. (75, 76) Company documents and testimony also provide further evidence of the presence of asbestos, fibrous talc, and heavy metals in talcum powder products. (77, 78) Dr. William Longo tested historical samples provided in litigation. Test results reveal the presence of asbestos in approximately half of the samples tested. Additionally, fibrous talc was found at varying levels in all samples. (79-83)

Finally, I have reviewed the report of Dr. Michael Crowley that discusses the different chemicals added to the fragrance constituents contained in talcum powder products (84)Based on his review, he has concluded that these chemicals may contribute to the potential carcinogenicity of talcum powder products.

Therefore, based on the scientific literature and testing results, it is my opinion that the presence of asbestos, heavy metals, fibrous talc, and fragrances are all biologically plausible explanations for talcum powder products causing ovarian cancer.

Biological Mechanisms

Evidence of Migration of Talcum Powder Products (Talc, Asbestos, Other Minerals) to the Ovary and Fallopian Tubes

Clinical and laboratory studies have shown that talcum powder products can migrate to the ovaries and fallopian tubes. An early surgical study in healthy premenopausal women found that inert particles placed in women's vaginas moved to their fallopian tubes within 30 minutes in two of the three patients studied.(85) Henderson et al. found talc particles in 10 of 13 (75%) of ovarian tumors studied using an extraction-replication technique.(86) The findings were replicated 8 years later, with all surgeons removing the ovaries wearing gloves with no talc, to ensure that surgical contamination was not the cause of the observed talc within ovaries.(87) This replication study found talc in all 9 samples studied—3 normal ovaries, 3 cystic ovaries, and 3 adenocarcinomas.

In another relevant clinical experiment regarding migration, the researchers placed 3 ml of ^{90m}Tc-labelled human albumin microspheres in women's vaginas one day before pelvic surgery. (88) Of the 21 women for whom the materials moved up from the cervical area, ovaries and fallopian tubes could be counted separate from the uterus in 14. Of these 14, 9 showed radioactivity in the fallopian tubes and ovaries, and 5 showed no radioactivity. In a pathological study as part of a case-control study of benign ovarian conditions, ovaries from 24 women were tested for presence of talc and asbestos by both electron microscopy and light microscopy. (64) All tested ovaries were found to have talc present. Only half of the 24 women reported a history of perineal talc exposure, which suggests additional routes of exposure to talc, such as inhaled powder. The presence of talc was not due to surgical gloves as all surgeons wore talc-free gloves in this study. In another study employing microscopy (Raman), the study authors found talc particles in ovarian tissue samples from a woman with known perineal talc exposure that were not visible with other methods. (89)

Another study demonstrated migration of talc evaluated powder on medical gloves used to perform pelvic examinations (with gloved hand inserted into the vagina).(90) This study detected powder in the peritoneal fluid, fallopian tubes, and ovaries the following day after the pelvic examination in women exposed to powdered gloves but almost none in women exposed to unpowdered gloves. The differences between the two groups were statistically significant.

In 2007, Cramer described the presence of talc particles observed in a pelvic lymph node of a 68 year old woman with stage III serous ovarian carcinoma. (91) The authors used scanning electron microscopy to identify plate-like particulates in the 5-10 μ m range within the lymph node, and energy dispersive X-ray spectroscopy revealed a magnesium and silicate signature compatible with talc. The authors also noted that talc could migrate through transport of the lymphatic system.

The results of these studies demonstrate talcum powder products can migrate from the perineal area to the ovaries and fallopian tube through both genital tract migration and inhalation. In my opinion it is biologically plausible that talcum powder products can reach the ovaries via migration from the perineum and via inhalation into the lungs, blood stream, and lymphatic system.

Inflammation in the Causal Pathway between Talcum Powder Product Use and Ovarian Cancer Development

The literature suggests that a likely pathway through which use of talcum powder products increases risk of ovarian cancer is through talc-induced inflammatory response.(92) As described above, it is well supported that talc can migrate through the female genital tract and settle in the area of the ovaries, fallopian tubes, and peritoneum (64, 86-88, 91, 93). Increased blood levels of biomarkers of inflammation have been linked to increased risk for ovarian cancer. A recent meta-analysis of 8 cohort studies found that women with high blood levels of c-reactive protein (a marker of increased systemic inflammation) had almost double the risk of developing ovarian cancer compared with women with low levels.(94)

Further evidence of the inflammation mechanism comes from studies which evaluate anti-inflammatories, like aspirin and NSAIDs, and reduction of risk of ovarian cancer. A pooled analysis of case-control studies published in 2014 showed that long-term daily use of aspirin (which blocks inflammation) decreased risk of ovarian cancer (odds ratio = 0.91; 95% CI = 0.84-0.99) Similar, but not statistically significant, results were shown for use of other nonsteroidal anti-inflammatory medications.(95) A 2018 meta-analysis found an 11% reduced risk of ovarian cancer with aspirin use (relative risk 0.89, 95% CI 0.83-0.95).(96) Aspirin and other nonsteroidal anti-inflammatory medications inhibit the inflammation-mediating enzyme, COX-1(95); COX-1 is frequently overexpressed in ovarian cancer tissue.(97, 98)

Chronic inflammation may result in cell proliferation, inhibition of apoptosis, and secretion of mediators, that may promote tumorigenesis.(92) Factors related to the inflammation of the ovarian surface and tubal epithelium, such as incessant ovulation, endometriosis, and pelvic inflammatory disease, provide further evidence of inflammation and ovarian carcinogenicity. (99-101)

Talc exposure has also been linked to increased inflammation. It can induce granulomas and other inflammatory responses in vivo.(102, 103) Injected into the pleural cavity to treat pneumothorax, talc stimulates an intra-pleural inflammatory reaction that causes pleural fibrosis and scarring, leading to obliteration of the pleural space and prevention of recurrent pneumothoraces.(104) In humans, elevated interleukin 8 (a chemotactic cytokine) occurs after pleural injection of talc.(105) In a study of over 227 patients treated with talc pleurodesis; about half received small particle talc, and half received large-particle talc. Patients who received small particle talc had significantly higher proinflammatory cytokines, particularly interleukin 8, in pleural fluid and serum after talc application.(106) In animal models, injection of talc into the pleura can cause local and systemic inflammatory responses(107) including elevated inflammation-related biomarkers c-reactive protein and interleukin 8(108) as well as VEGF, and TGF-beta.(109) This type of inflammation can induce neoplastic changes.(110)

Additional Evidence of Biological Mechanisms

Exposing human ovarian stromal and epithelial cells to talc resulted in increases reactive oxygen species (oxidative stress), cell proliferation and neoplastic transformation of cells.(110) Similarly, in a recent *in vitro* study by Fletcher et al., talc was applied in different concentrations, for varying numbers of hours, to epithelial ovarian cancer cell lines and normal ovarian epithelial cells.(111) As early as 24 hours post-treatment, they found increases in mRNA (gene expression) of pro-oxidant enzymes iNOS and MPO in talc-treated epithelial ovarian cancer cells and normal ovarian cells, compared with non-treated controls. Marked decreases in several antioxidant enzymes in talc-treated cells were also seen. This study supports the role of talc in inducing oxidative stress, providing a molecular basis for epidemiologic studies demonstrating an increased risk of ovarian cancer with perineal talcum powder product exposure.(111-113) Another *in vitro* study found that talc induced a biological effect by enhancing CA-125 in ovarian cancer cells and in normal cells.(114)

Talc application to human mesothelial cells in cell culture has also been shown to increase gene expression in 30 genes that are relevant to carcinogenesis, and asbestos application increased gene expression in over 200 genes.(115) In the same study, asbestos application to human ovarian epithelial cells increased gene expression in two genes at 8 hours and 16 genes at 24 hours. Many of the expressed genes are relevant to the carcinogenic process. Results from this experimental study show that talc causes a statistically significant increase in gene expression in mesothelial cells in

several genes related to carcinogenesis, including activating transcription factor 3 (ATF3), which controls production of several markers of inflammation.(115)

Asbestos, which has been found in talcum powder products, has been classified by IARC as a known ovarian carcinogen after a systematic review of the epidemiological and biological science.(40) Two meta-analyses and one pooled analysis have addressed the association between asbestos exposure and risk of ovarian cancer.(71-73) The studies of asbestos and ovarian cancer were typically studies of cohorts with high levels of occupational or home asbestos exposure, and comparisons were made to the general population as controls. The most recent meta-analysis found that women exposed to asbestos had a relative risk dying of ovarian cancer of 1.77 (95% CI 1.37-2.28) compared with unexposed populations(71). The other meta-analysis found that women exposed to asbestos had a relative risk of developing or dying of ovarian cancer of 1.75 (95% CI 1.45-2.10) compared with unexposed women(72). An additional four cohort studies (73, 116-119), which were published after the date of the most recent meta-analysis(71), as well as the pooled analysis(73) found similar elevated risks of ovarian cancer in women with asbestos exposure.

IARC also lists mechanisms through which asbestos can cause cancer including: impaired fiber clearance leading to macrophage activation, inflammation, generation of reactive oxygen and nitrogen species, tissue injury, genotoxicity, aneuploidy and polyploidy, epigenetic alteration, activation of signaling pathways, and resistance to apoptosis.(41) Asbestos is another biologically plausible explanation for talcum powder products causing ovarian cancer.

It is my opinion, based on these studies, that talc and asbestos induce inflammation which results in cell proliferation, inhibition of apoptosis, and secretion of mediators, that may promote tumorigenesis. This adds to the weight of evidence and provides a plausible biological explanation for the association between genital talcum powder product use and ovarian cancer.

Another line of experiments in support of the biologically plausible mechanism for talcum powder products causing ovarian cancer were conducted in animals. A study with female rats showed that talc is absorbed through the pleural surface and rapidly disseminated throughout internal organs and lymph nodes.(120) Henderson et al found that talc placed in the uteruses or vaginas of female rats moved to the animals' ovaries by four days post-administration.(121)

In another study, exposure of rat ovaries to talc led to cyst formation and epithelial changes. (122) A methodology study discovered that talc caused superoxide anion generation and release from mouse macrophages. (123)

Animal experiments conducted by the National Toxicology Program (NTP) of the U.S. Department of Health and Human Services are highly relevant to the role of talc in carcinogenesis. An NTP rat study provided important "signal" information of talc toxicity relevant to talc and development of ovarian cancer.(124) In an inhalation study, male and female F344/N rats were exposed to daily talc aerosols of non-asbestiform talc, with appropriate controls. NTP concluded that there was clear evidence of carcinogenic activity of talc in female F344/N rats based on increased incidences of alveolar/bronchiolar adenomas and carcinomas of the lung, and benign and malignant pheochromocytoma of the adrenal gland. The NTP also concluded that there was some evidence of carcinogenic activity of talc in male F344/N rats based on an increased incidence of benign and malignant pheochromocytoma of the adrenal gland.

In my opinion, these animal studies further demonstrate that talcum powder products and its attendant inflammation can induce carcinogenesis. This provides further evidence of a biologically plausible mechanism supporting causation of ovarian cancer from the use of talcum powder products.

Summary of Findings: Weight of the Evidence/Bradford Hill Analysis

The summary relative risk estimates from the most recent meta-analyses (34, 35) and the pooled analysis (39) indicate that women who have ever used talcum powder products in the perineal/genital areas (including use of sanitary

napkins, diaphragms, underwear, and direct application) have approximately 22-31% increased risk of developing ovarian cancer compared with never-users.

This review of the association between talcum powder products in the perineal/genital area produced several clear findings. Below, they are outlined according to the aspects of causality as described by Bradford Hill.(43) The epidemiologic evidence in total, along with the biological and pathological evidence, fits virtually all of the Bradford Hill aspects for causation, namely: the strength of the association, consistency across populations, specificity, temporality, experiment, biologic gradient (dose-response), plausibility, coherence, and analogy.

Strength of the association and statistical significance: The meta-analyses and pooled analysis showed that risk of ovarian cancer among ever users of talcum powder products is 22-31% higher than in women who never used these products. A total of 28 case-control studies, 3 prospective cohort studies, 2 meta-analyses, and one pooled analysis were reviewed in depth. The meta-analyses found a statistically significant 24 – 25% increased risk of developing serous ovarian cancer—representing 52% of epithelial ovarian cancer cases(125)—in women who had ever used talcum powder products compared with never-users. The pooled analysis, which included data from 5 previously published and 3 unpublished case-control studies, found similar statistically significant increased risks for overall epithelial ovarian cancer and serous ovarian cancer (24% and 20%, respectively). Thus, when combining these studies through meta-analyses, the totality of the evidence shows a statistically significant increased risk of ovarian cancer with use of perineal talcum powder products. Viewed in the context of the high consistency of the study results across time, diverse study populations, and strong study designs, bias and chance as explanation for the increased risk are unlikely. Further, my confidence in the reliability of the data on magnitude of the risk is enhanced. Therefore, my analysis of these studies strongly supports a causal association and, given the high prevalence of use of talcum powder products in this population, these levels of risk present a clinically significant public health concern. I placed high weight on this aspect of determination of causality.

Consistency of the association: Across the case-control and cohort studies, the association between use of talcum powder products and risk of ovarian cancer was highly consistent. As indicated above, the case-control studies included population-based and hospital-based studies from a diverse geographic area across the U.S., as well as Australia, Canada, the UK, Israel, Greece, and China. Of the 28 studies, 24 found odds ratio greater than 1.1 for ovarian cancer in women who had any perineal exposure to talcum powder products, compared with never users (1-6, 8-11, 13-23, 25-27). Of these 24 odds ratio estimates, 16 were statistically significant (95% confidence intervals excluded 1.0 or p value ≤ 0.05). Among the 8 studies which were not statistically significant, 7 had a sample size lower than that estimated to be needed to have power to detect a statistically significant result. Furthermore, the increased risk of ovarian cancer with use of talcum powder products has been seen in various race/ethnic groups as well as in diverse geographic areas around the world. While the cohort studies on average showed more attenuated relative risks of ovarian cancer in relation to use of talcum powder product use, these studies were not well designed to determine true risk for ovarian cancer and perineal talc use. Therefore, their results as a group do not negate the significant case-control study findings and the significant results of the meta-analyses and the pooled analysis.

The most recent and comprehensive meta-analysis by Penninkilampi *et al.*, assessed consistency across the studies included in their analysis by measuring heterogeneity with Cochran's Q statistic, with P < 0.10 indicating heterogeneity.(34) They then quantified the degree of heterogeneity using the I^2 statistic. The I^2 statistic represents the fraction of the total variability across studies that is due to heterogeneity. The authors categorized I^2 values of 25%, 50%, and 75% as corresponding to low, moderate, and high degrees of heterogeneity, respectively, which is typical for meta-analyses.(126) The authors found that there was no heterogeneity in the relative risk estimates for exposure to talcum powder products in the perineal area, or on diaphragms or sanitary napkins. Even though the 95% confidence intervals contained 1.0 in the cohort studies, given the clearly increased relative risk across the case-control studies, the trend toward increased risk in two of the three cohort studies, and the results from the Penninkilampi et al. meta-analysis, it is my opinion that this did not occur by chance but is, in fact, a true causal relationship.

The consistency across studies, led by many investigators, using different study designs, and in diverse ethnic, racial, and geographic populations over a period of nearly 35 years weighs heavily as to the consistency and reliability of the data in favor of a causal risk. Accordingly, I placed significant weight on this factor in my causation analysis.

Specificity of the association: Use of talcum powder products is strongly associated with epithelial ovarian cancer. Analyses by histologic subtype of epithelial ovarian cancer found that serous ovarian cancer appeared to be most strongly and consistently related to talc exposure, although the pooled case-control project found associations some other subtypes of ovarian cancer. Mucinous cancers have been consistently found to be unrelated to use of these products. Therefore, the specificity aspect is present for epithelial ovarian cancer and certain subtypes. However, because many carcinogens have been shown to cause diverse and nonspecific morbidities, such as smoking, I weighed this aspect moderately in my causal analysis as compared to other Bradford Hill factors.

Temporality: The epidemiologic studies that looked at lifetime talcum powder product use supported that exposure to these products predated the diagnosis of ovarian cancer. I did not find any evidence of 'reverse causation', e.g., using talcum powder products to alleviate symptoms associated with ovarian cancer, nor do any investigators report finding reverse causation. Importantly, symptoms related to ovarian cancer (bloating, increased abdominal size, abdominal pain, pelvic pain, difficulty eating, feeling full quickly)(127) are not vaginal or perineal in origin, and would be unlikely to induce women to increase use of talcum powder products. The finding of temporality is an important component in the causal analysis and, as such, I place great weight in its applicability to the determination of causality.

Biologic gradient/ dose-response: The earlier studies were less likely to address dose-response associations. The larger, and more recent studies, however, collected important data that inform dose-response relationships. Many of the 28 case control studies found evidence of a dose-response effect. Most often, this took the form of lifetime numbers of applications of talcum powder products or years of use. Thus, while there were studies that did not look for or find a dose-response, the body of literature when taken as a whole does indicate a dose-response effect. Some studies did not gather detailed dose data such as frequency of use or length of use. Others gathered either frequency of the use or duration of use, but not both. As with smoking, ascertainment of frequency x duration of exposure (cumulative exposure) is an optimal metric to determine true dose-response effects. The meta-analyses and the pooled analysis also found evidence of relationships between increasing amount of exposure to talcum powder products in the perineal/genital area (including frequency, years of use, and estimates of lifetime applications) and increased risk of developing epithelial ovarian cancer (i.e., dose-response relationships). Thus, the studies that accurately determined use of talcum powder products revealed evidence of dose-response effects. When present, the finding of a biologic gradient/dose-response is helpful in determining causation. The findings within the study data, particularly meta-analyses and the pooled analysis, thus, supports my causal analysis and I placed significant weight on this factor.

Plausibility: In my consideration of whether talcum powder products can cause cancer, I considered the data for biologically plausible mechanisms by which exposure to talc could result in ovarian cancer. In that regard, I assessed data and determined that talcum powder products can migrate from the perineum through the female genital tract to the ovaries; talcum powder products are found in ovarian and fallopian tube tissues; talcum powder products can induce an inflammatory response; and because of the inflammatory response, malignant transformation can occur. Support for these finding comes from reliable, peer-reviewed scientific literature which indicates that talcum powder products can migrate from the perineum up the genital tract to the fallopian tubes and ovaries and become imbedded in the ovarian tissue. Thus, it is biologically plausible that genital exposure to talcum powder products can result in exposure to the ovaries.

Data also plausibly indicates that inhalation of talcum powder products can result in exposure leading to cancer, including mesothelioma. Studies also show that talcum powder products can be absorbed and transported via the lymphatic system or blood stream. Therefore, inhalation of talcum powder products could result in similar ovarian exposure. Published scientific data shows that talc reaches the ovary and becomes imbedded in the ovarian tissue. There are reliable data to support that talc induces an inflammatory response which mediates oxidative stress, release

of cytokines and resulting genotoxicity which can induce malignant transformation. Further, the presence of asbestos and other constituents in the talcum powder products such as asbestos, heavy metals, and fragrance have been shown to induce cancer by similar mechanisms.

While I have considered the data that do not support the plausibility of talcum powder products' carcinogenicity, otherwise overwhelming and reliable evidence indicates that there are biologically plausible mechanisms by which talcum powder products can induce ovarian carcinogenicity. Talc and its constituents can reach the ovaries, induce an inflammatory response that leads to genotoxicity and to development of ovarian cancer. While this mechanism of carcinogenicity is not proven, it is highly biologically plausible based on the present scientific information and understanding. Therefore, I place significant weight on this aspect of determination of causality.

Coherence: The cause-and-effect interpretation of the data on talcum powder product use and risk of ovarian cancer clearly do not significantly conflict with the known facts about the natural history and biology of the disease. Increased inflammation has been linked to risk of ovarian cancer, and talc and other contents of talcum powder products elicit inflammatory responses within areas of the body in which they have been found (i.e. ovary, peritoneum, lymph nodes, etc.). By analogy, a similar mechanism has been reported by which asbestos causes ovarian cancer. These mechanisms are consistent with one another and the accepted understanding of the role of inflammation in carcinogenesis. While these factors support a causal association and my opinions in this regard, I do not weigh them quite as heavily as the strength and consistency of the association.

Experiment: As discussed above, the evidence from randomized controlled trials can provide strong support to observational evidence. However, here, randomized controlled trials are neither feasible nor ethical, similar to smoking and lung cancer. This is because ovarian cancer is a rare disease and typically takes decades to develop to be clinically diagnosable. In addition, because the effects of genital talcum powder product use could be harmful, it would be unethical to conduct a trial of this type. Furthermore, the studies involving migration of talc, the inflammatory process and its association with carcinogenesis all contribute in a compelling manner to the causal analysis. While there are experimental data supporting causation from cell studies and animal models, given the inability to conduct experimental studies in humans to test effects of talcum powder products on ovarian cancer development, there are no human experimental data. Despite this, data from reliable observational studies as described in this report strongly support causation. Therefore, I placed slight weight to this aspect of determination of causality.

CONCLUSION

In conclusion, it is my professional opinion, stated to a medical and scientific degree of certainty, that based on the totality of the evidence, which includes epidemiological, biological, pathological and mechanistic data, perineal use of talcum powder products can cause ovarian cancer.

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