Exhibit 264

Occupational trichloroethylene exposure and risk of lymphatic and haematopoietic cancers: a meta-analysis

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ABSTRACT

The carcinogenic potential of trichloroethylene (TCE) continues to generate much controversy, even after the US Environmental Protection Agency raised its classification to 'carcinogenic to humans'. We conducted a meta-analysis of published cohort and case-control studies exploring occupational TCE exposure in relation to five different lymphatic and haematopoietic cancers: non-Hodgkin's lymphoma (NHL, N=24), Hodgkin's lymphoma (HL, N=13), multiple myeloma (MM, N=11), leukaemia (N=12) and chronic/small lymphocytic leukaemia (CLL/SLL, N=7). Studies published between 1950 and 2011 were identified through a PubMed Medline search. All studies included in analyses were classified as those that assessed either occupational TCE exposure specifically ('TCE-exposure' studies) or a broader classification of all chlorinated solvents ('chlorinated solvent-exposure' studies). A significantly raised summary estimate for NHL was seen for all cohort and case-control 'TCE-exposure' studies combined (N=19: relative risk (RR)=1.32, 95% CI 1.14 to 1.54: I²=25.20; p-heterogeneity=0.12) and for cohort 'TCEexposure' studies (N=10; RR=1.52, 95% CI 1.29 to 1.79; I²=7.09; p-heterogeneity=0.63). A non-significant but raised summary estimate was seen for NHL casecontrol 'TCE-exposure' studies. No significant association with NHL risk was detected overall for any 'chlorinated solvent-exposure' studies. Summary estimates for occupational TCE exposure were not associated with risk of HL, MM, leukaemia or CLL/SLL. Our updated metaanalysis of NHL, which incorporates new analytical results from three cohort and four case-control studies, supports an association between occupational TCE exposure and NHL.

INTRODUCTION

Inconsistent epidemiological evidence, the difficulty of extrapolating findings from animal models to humans and debate over the interpretation of epidemiological results have fuelled controversy surrounding the toxicological and carcinogenic potential of trichloroethylene (TCE). 1-3 In 2006, the National Academy of Sciences recommended that additional meta-analytical studies be conducted to further examine the human health risk assessment of TCE exposure.3 As a result, in 2011 the US Environmental Protection Agency released its human risk assessment of TCE, raising the agent's classification as 'carcinogenic to humans'. Subsequently, in 2012, the International Agency for Research on Cancer (IARC) also raised TCE's classification from a group 2A 'probable human carcinogen' to a group 1 'human carcinogen'.2 Case 7:23-cv-00897-RJ

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What this paper adds

- ▶ This review presents findings for updated meta-analyses of occupational trichloroethylene (TCE) exposure and risk of five different lymphatic and haematopoietic cancers.
- In efforts to reduce exposure misclassification, summary risk estimates for studies that assessed TCE specifically ('TCE-exposure' studies) were compared with those assessing any type of chlorinated solvent ('chlorinated solvent-exposure' studies).
- The meta-analysis for non-Hodgkin's lymphoma (NHL), which incorporated results for 293 NHL cases from 12 cohort (228 cases from 10 'TCE-exposure' and 65 cases from two 'chlorinated solvent-exposure') studies and 8140 NHL cases from 12 case-control (6095 cases from nine 'TCE-exposure' and 2045 cases from three 'chlorinated solvent-exposure') studies, was supportive of an association between occupational TCE exposure and increased risk.
- The association for NHL was not observed for studies that used the broader category of 'chlorinated solvent' exposure, suggesting that this exposure metric, which has been used in previous meta-analyses, may introduce exposure misclassification, resulting in bias towards the null.
- These findings indicate that efforts to reduce exposure misclassification by analysis of TCE specifically may strengthen the association between TCE exposure and cancer risk.

Widely manufactured for commercial use as a solvent for nearly a century, TCE is primarily used in the vapour degreasing of metal parts.4 This chlorinated solvent has also been used in the drycleaning, food and chemical processing, healthcare and electronics industries. 4-6 People working in degreasing operations are among the most heavily TCE-exposed workers.⁵ According to the US National Institute for Occupational Safety and Health, about 3.5 million US workers are exposed to TCE.8 In addition, the solvent continues to be classified as a hazardous waste pollutant, persists as a common groundwater contaminant and is one of the most commonly observed chemicals at Superfund sites, abandoned hazardous locations requiring long-term response in order to clean up pollutant material contaminates.3 4 9 Since the

Filed 08/24/25 Page 2 of 11 1970s TCE use worldwide has declined owing to economical, regulatory and public health concerns.^{4 5 9} TCE use in most industries has diminished and it has been replaced by other chlorinated and non-chlorinated solvents. A limitation of some previous reviews is that they have examined exposure to chlorinated solvents as a surrogate for TCE exposure, which might have increased the likelihood of TCE-exposure misclassification.^{10 11} To examine this subject, we conducted a meta-analytical review of published studies to explore the link between occupational TCE exposure and risk of lymphatic and haematopoietic cancers by assessing whether studies that evaluated TCE exposure differed explicitly from those that evaluated mixed chlorinated solvent exposures.

Both animal and human studies have shown an increased risk of lymphoid neoplasms after TCE exposure. 1-4 8 9 In humans, TCE exposure has been associated with reduced activity of markers of immune activation and major lymphocyte subsets (ie, CD4, CD27, CD30), which play a vital role in regulating the cellular activity of T, B and natural killers cells that are critical for immune response. 12 TCE exposure has also been shown to stimulate unscheduled DNA synthesis in vitro in human lymphocytes, a mechanism that has been associated with increased cancer risk. 13 14 Since TCE can dysregulate and impair immune functions, concerns about the solvent's immunotoxic effects have motivated numerous investigations of the association between TCE exposure and lymphoma risk, which have been associated with reduced immune function. Given that over the past half-century there have been substantial changes in the histological categorisation of lymphoid neoplasms (ie. the International Classification of Diseases (ICD), revision 7-9 and ICD for oncology revision 3), it has been challenging to discern the exact relationship between TCE exposure among the different subtypes of lymphoid neoplasms. 15-18 To deal with this concern, our review also evaluated the association between occupational TCE exposure and the risk of five different lymphatic and haematopoietic cancers using consistent criteria, defined according to ICD-9: non-Hodgkin lymphoma (NHL: ICD-9 200, 202), Hodgkin's lymphoma (HL: ICD-9 201), multiple myeloma (MM: ICD-9 203.0), leukaemia (ICD-9 204-208) excluding chronic/small lymphatic leukaemia (CLL/SLL) and CLL/SLL (ICD-9 204.1). To our knowledge, this is the first meta-analytical assessment of occupational TCE exposure in relation to CLL/SLL risk. Our review also incorporates new analytical results from both cohort (three NHL, five HL, four MM and five leukaemia) and case-control (four NHL, two HL and two MM) studies not assessed in previous meta-analyses of TCE. $^{10\ 19-21}$

METHODS

Study identification, data extraction and exposure assessment

We conducted a PubMed Medline (http://www.ncbi.nlm.nih. gov/sites/entrez) search using the following key words: trichloro-ethylene exposure and cancer, organochlorine exposure and cancer, chlorinated solvents and cancer, solvent exposure and cancer and occupational exposures and lymphoma. All published cohort and case—control studies written in English from 1950 through 2011 that assessed occupational TCE or chlorinated solvent exposure and risk of NHL, HL, MM, leukaemia or CLL/SLL were included in our review. References in all identified publications were also reviewed for additional studies. As a result, we excluded community-based studies of TCE exposure from drinking water, since the level and route of exposure differ from those found in occupational settings. Document

standardised incidence ratio/standardised mortality ratio (SIR/SMR) studies that evaluated cancer risk among a wide range of workers for whom the likelihood of TCE exposure is considered lower than for other solvents (ie, paints, benzyl chloride, diesel, etc). Except for one study that specifically assessed TCE in the industry,²² studies of dry-cleaners and launderers were excluded from our analysis as most of these studies either had low or unknown specificity of TCE exposure.⁵

Subsequent exclusions of cohort studies that reported proportionate mortality ratios/proportionate cancer mortality ratios were made, 23-27 as well as those reporting SMRs without providing information on the number of observed/exposed cases.²⁸ When risk estimates were not presented, where possible, we calculated crude risk estimates using the number of subjects provided in the manuscripts (ie, expected/observed cases and unexposed/exposed subjects). ²² ^{30–34} When more than one manuscript was published on the same cohort, we chose the publication with the highest quality and most precise exposure assessment. Thus, Zhao et al³⁵ and Boice et al³⁶ both published manuscripts on the same cohort using different inclusion criteria; in our analysis, we included results from the Boice et al³⁶ study which had a longer follow-up of more participants and assessed TCE exposure separately for lymphoma subtypes. We also identified three manuscripts on the same cohort of US aircraft workers²⁸ 31 37; the study with the most recent follow-up was included in our review.31 Likewise, two other US studies conducted on the same cohort of aircraft workers were identified³⁸ ³⁹; only results from the extended follow-up study were used.³⁹

For a number of case–control studies, overlapping sets of participants from the same population were recruited. Two Swedish studies enrolled cases and controls from the same population during similar time periods³³ ⁴⁰; only NHL results from the larger study were included in our review.⁴⁰ However, HL results from this population were only reported in the smaller study and were therefore used in our analysis of HL risk.³³ Additionally, an overlapping number of cases and controls from a German case–control study³⁴ was also included in a larger European multicentre study.³² Because the larger European multicentre study did not evaluate HL risk, findings from the German case–control study were included in our analysis of HL risk. In total, our final analysis included 12 cohort (12 NHL, 10 HL, 9 MM, 11 leukaemia and 2 CLL/SLL) and 16 case–control (12 NHL, 3 HL, 2 MM, 1 leukaemia and 5 CLL/SLL) studies.

To evaluate the specificity of the TCE-exposure data available in each study, an expert industrial hygienist (PAS) blinded to the epidemiological results categorised each study into two groups: 'TCE-exposure' and 'chlorinated solvent-exposure' studies. Cohort studies that assessed TCE exposure using job-exposure matrices (JEMs) or biomonitoring data, and case—control studies that assessed TCE exposure specifically or covered metal degreasing/cleaning industry workers were classified as 'TCE-exposure' studies. Studies that assessed exposure to a broader group of chlorinated solvents or covered aircraft manufacturing, iron or metal workers were classified as 'chlorinated solvent-exposure' studies. Consistent categorisation of studies as 'TCE-exposure' or 'chlorinated solvent-exposure' was found between the expert industrial hygienist and the authors.

For two studies, the subcohort analysis was selected that assessed TCE exposure using more restrictive inclusion criteria, thereby reducing the likelihood of TCE-exposure misclassification. However, similar results but with less precise risk estimates were observed when all cohort members were included in the analysis. Additionally, since the industrial use of TCE has declined over recent decades, we also evaluated the association

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between occupational TCE exposure and cancer risk by the median publication year for cohort and for case–control studies separately, the median of the maximum length of years of follow-up for cohort studies, the median year that follow-up was initiated for cohort studies and the median recruitment year for case–control studies.

Statistical analysis

Summary risk estimates for NHL, HL, MM, leukaemia and CLL/SLL were calculated individually. Initially, separate analyses were carried out for cohort and case-control studies; subsequently, we performed analyses for cohort and case-control studies combined. Likewise, we evaluated estimates for 'TCE-exposure' studies and for 'chlorinated solvent-exposure' studies, separately and combined. Because of the potential for overlap between the Axelson et al⁴¹ cohort and three Swedish case—control studies, ³³ ⁴⁰ ⁴² sensitivity analyses were performed with and without these three studies for analyses of all studies combined. Also, since a small proportion of subjects in the Purdue et al43 case-control study might have overlapped with participants in two US cohorts that included California residents from the same area, ³⁶ ³⁹ sensitivity analyses were conducted by including and excluding the Purdue et al⁴³ case-control study from analyses of all studies combined. Overall, sensitivity analyses showed no major differences in risk estimates. Subgroup-specific summary estimates by study location (ie, Europe or USA), study type (ie, SIR or SMR), sex and use of different exposure metrics (ie, high vs low intensity or duration) were also performed. Given the dissimilar use of quantitative exposure cut-off points and duration categories in previous studies to define higher exposed groups or longer exposure duration, we conducted subgroup analyses for TCE exposure by the highest and lowest intensity regardless of duration of exposure and by the longest and shortest durations regardless of information on the quantitative level of exposure.

After merging data from all studies into a single dataset, we estimated summary relative risks (RRs) or odds ratios (ORs) and 95% confidence intervals (CIs) using random-effects models. The Higgin's I² statistic and Cochrane's Q test were used to evaluate heterogeneity across the studies.44 Where heterogeneity was seen, an influence analysis was conducted; each study was omitted one at a time from that analysis and the summary risk estimate was recalculated. Publication bias was assessed statistically using the Egger and Begg methods and through evaluation of funnel plots. 45 The influence of potential publication bias on risk estimates was further evaluated by implementing the Duval and Tweedie non-parametric 'trim-and-fill' method. 46 Statistical tests were determined to be significant using a two-sided p value <0.05. All analyses were conducted using STATA software V.10 (College Station, Texas, USA).

RESULTS

A detailed summary of all cohort²² 30 31 36 39 41 47–52 and case–control^{32–34} 40 42 43 53–63 studies included in our analysis of NHL, HL, MM, leukaemia and CLL/SLL are presented in online supplementary table S1. Data for study size, location, exposure assessment methods, risk estimates and person-years and length of follow-up (for cohort studies) are provided for each study.

NHL cohort and case-control studies combined

A summary estimate of 1.21 (95% CI 1.06 to 1.38; I²=35.91; p-heterogeneity=0.04) was observed for cohort and case— Case 7:23-cv-00897-RJ Document control studies combined. This risk estimate remained significantly increased after excluding an outlier study that introduced the greatest variability (RR=1.17; 95% CI 1.04 to 1.32; I^2 =29.64; p-heterogeneity=0.13).²² A slightly stronger estimate was detected for cohort and case–control 'TCE-exposure' studies combined (RR=1.32, 95% CI 1.14 to 1.54; I^2 =25.20; p-heterogeneity=0.12). For 'chlorinated solvent-exposure' studies, risk was not increased (RR=0.96, 95% CI 0.80 to 1.14; I^2 =2.49; p-heterogeneity=0.65).

Analysis by the median publication year for cohort and for case-control studies, the median of the maximum number of years of follow-up and the median year that follow-up was initiated for cohort studies, as well as the median recruitment year for case-control studies showed similar risk estimates (data not shown). Overall, no evidence of publication bias, assessed using the Begg and Egger tests as well as funnel plots, was seen for analyses involving NHL cohort and case-control studies combined (data not shown).

NHL cohort studies

A significantly increased summary risk estimate of 1.52 (95% CI 1.29 to 1.79; I^2 =7.09; p-heterogeneity=0.63) was seen for NHL cohort studies of TCE-exposed workers (table 1 and figure 1). In contrast, risk was not increased for cohort studies of chlorinated solvent-exposed workers (RR=0.85, 95% CI 0.66 to 1.10; I^2 =0.02; p-heterogeneity=0.89). For all cohort studies combined, a significantly increased summary of 1.33 (95% CI 1.07 to 1.66) was seen with some evidence of heterogeneity (I^2 =21.12; p-heterogeneity=0.03); however, risk remained raised (RR=1.45, 95% CI 1.22 to 1.73; I^2 =11.08; p-heterogeneity=0.35) after removal of a cohort that introduced the greatest variability.⁵²

When studies of cancer incidence (SIR) and mortality (SMR) and European and US, 'TCE-exposure' studies were compared, a stronger risk estimate was seen for SIR and European (RR=1.66, 95% CI 1.29 to 2.14; I²=3.19; p-heterogeneity=0.36) than for SMR and US (RR=1.41, 95% CI 1.11 to 1.78; I²=3.13; p-heterogeneity=0.68) studies. A somewhat similar pattern was seen when we combined all cohort studies, with lower SMR risk estimates observed (RR=1.15, 95% CI 0.90 to 1.47; I²=11.23; p-heterogeneity=0.13). Comparable summary estimates were detected for studies that included only male participants compared with those of both sexes.

Among cohort 'TCE-exposure' studies that examined duration of occupational exposure (N=4), a significant summary risk estimate of 1.56 (95% CI 1.02 to 2.40; I²=4.66; p-heterogeneity=0.20) was seen among workers who had a longer duration of exposure (\geq 6.25 years, ²² \geq 5 years, ³¹ ³⁹ \geq 2 years⁴¹) compared with those with a shorter exposure duration (<6.25 years, ²² <5 years, ³¹ ³⁹ <2 years ⁴¹) (RR=1.30, 95% CI 0.92 to 1.84; I²=3.75; p-heterogeneity>0.29). No significant pattern of association was seen for studies that assessed intensity of TCE exposure. ²⁰ ³¹ ³⁷ ³⁸ ⁴⁰ ⁴² Additionally, a statistically significant twofold increased risk (RR=2.15, 95% CI 1.34 to 3.45; I²=1.47; p-heterogeneity=0.48) was detected among studies that identified TCE exposure through urinary biomonitoring data.

Overall, no evidence of publication bias, assessed using funnel plots or the Begg and Egger tests, was identified among NHL cohort studies.

NHL case-control studies

38; I²=35.91; A similar non-significant risk estimate was observed for both rt and case- 'TCE-exposure' studies (OR=1.14, 95% CI 0.93 to 1.40; Document 481-8 Filed 08/24/25 Page 4 of 11

Table 1 Summary estimates of cohort studies of occupational TCE exposure and NHL risk

	Number of studies	RR	95% CI	Test for heterogeneity		Test for publication bias	
				l ²	p Value	p Value (Begg)	p Value (Egger)
TCE-exposed studies							
Allt	10	1.52	(1.29 to 1.79)*	7.09	0.63	0.42	0.67
US studies	6	1.41	(1.11 to 1.78)*	3.13	0.68	0.09	0.08
European studies	4	1.66	(1.29 to 2.14)*	3.19	0.36	1.00	0.36
Male participant studies	4	1.48	(1.09 to 2.01)*	2.72	0.44	0.50	0.37
Female participant studies	0						
Male and female participant studies	6	1.53	(1.27 to 1.86)*	4.33	0.50	0.85	0.70
Incident studies	4	1.66	(1.29 to 2.14)*	3.19	0.36	1.00	0.36
Mortality studies	6	1.41	(1.11 to 1.78)*	3.13	0.68	0.09	0.08
Low-intensity studies	5	1.68	(1.14 to 2.46)*	0.41	0.98	0.33	0.54
High-intensity studies	5	1.27	(0.83 to 1.96)	2.81	0.59	0.62	0.67
Low-duration studies	4	1.30	(0.92 to 1.84)	3.75	0.29	1.00	0.95
High-duration studies	4	1.56	(1.02 to 2.40)*	4.66	0.20	0.50	0.70
Chlorinated solvent-exposed studies							
All‡	2	0.85	(0.66 to 1.10)	0.02	0.89		
US studies	1	0.82	(0.44 to 1.41)				
European studies	0						
Male participant studies	0						
Female participant studies	0						
Male and female participant studies	2	0.85	(0.66 to 1.10)	0.02	0.89		
Incident studies	0						
Mortality studies	2	0.85	(0.66 to 1.10)	0.02	0.89		
Low-intensity studies	0						
High-intensity studies	1	0.84	(0.42 to 1.51)				
Low-duration studies	0						
High-duration studies	0						
All cohort studies							
All§	12	1.33	(1.07 to 1.66)*	21.12	0.03¶	0.41	0.84
US studies	7	1.31	(1.05 to 1.62)*	5.99	0.43	0.10	0.14
European studies	4	1.66	(1.29 to 2.14)*	3.19	0.36	1.00	0.36
Male participant studies	4	1.48	(1.09 to 2.01)*	2.72	0.44	0.50	0.37
Female participant studies	0						
Male and female participant studies	8	1.30	(0.98 to 1.72)	17.39	0.02**	1.00	0.58
Incident studies	4	1.66	(1.29 to 2.14)*	3.19	0.36	1.00	0.36
Mortality studies	8	1.15	(0.90 to 1.47)	11.23	0.13	0.46	0.90
Low-intensity studies	5	1.68	(1.14 to 2.46)*	0.41	0.98	0.33	0.54
High-intensity studies	6	1.12	(0.78 to 1.60)	3.94	0.56	0.35	0.49
Low-duration studies	4	1.30	(0.92 to 1.84)	3.75	0.29	1.00	0.95
High-duration studies	4	1.56	(1.02 to 2.40)*	4.66	0.20	0.50	0.70

^{*}p Value <0.05. Summary estimate for:

 $I^2=10.51$; p-heterogeneity=0.23) and 'chlorinated solventexposure' studies (OR=1.05, 95% CI 0.83 to 1.33; $I^2=1.05$; p-heterogeneity=0.59) (table 2 and figure 2). Owing to evidence of publication bias for 'TCE-exposure' studies (p-Eggers=0.01), we applied the 'trim-and-fill' method; four studies were added and the magnitude of the association decreased but was not statistically significant (OR=1.04, 95% CI 0.84 to 1.28). Overall, no significant association was seen for all case-control studies combined (OR = 1.09;95% CI 0.94 to 1.25; $I^2=11.63$; p-heterogeneity=0.39; p-Eggers=0.003). This association was similar after five additional studies were added through the 'trim-and-fill' method (OR=1.03, 95% CI 0.89 to 1.19).

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Analyses of HL, MM, leukaemia and CLL/SLL Meta-analytical results for cohort and case-control studies com-

bined did not show significant associations between occupational TCE exposure and HL (RR=1.14, 95% CI 0.87 to 1.49; $I^2=14.63$; p-heterogeneity=0.26), MM (RR=1.05, 95% CI 0.88 to 1.27; $I^2=6.69$; p-heterogeneity=0.76), leukaemia Filed 08/24/25 Document 481-8 Page 5 of 11

Stratification by study location and sex did not disclose

significant associations and were similar after applying the

'fill-and-trim' method to address publication bias. Associations were not found when studies were evaluated by exposure intensity 43 53 54 56 63 or duration. 43 56 62

[†]Cohort TCE-exposure studies.

[‡]Cohort chlorinated solvent-exposure studies.

[§]All cohort studies

[¶]Exclusion of the McLean D, 2006 study removed heterogeneity: RR=1.45, 95% Cl 1.22 to 1.73; l²=11.08; p-heterogeneity=0.35; p-Begg=0.31; p-Egger=0.54.

^{**}Exclusion of the McLean D, 2006 study removed heterogeneity: RR=1.43, 95% CI 1.12 to 1.83; I²=8.34; p-heterogeneity=0.21; p-Begg=0.65; p-Egger=0.97. NHL, non-Hodgkin lymphoma; RR, relative risk; TCE, trichloroethylene; CI, confidence interval.

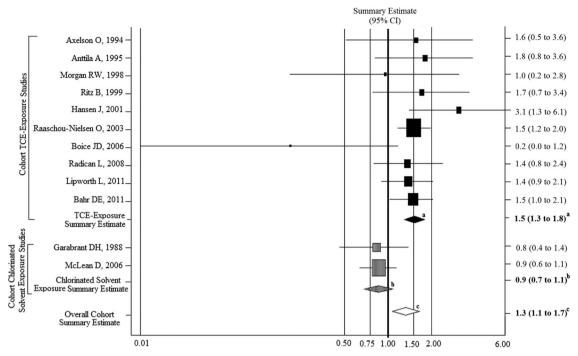


Figure 1 Summary estimates of cohort studies of occupational TCE exposure and NHL risk. NHL, non-Hodgkin's lymphoma; TCE, trichloroethylene. Summary estimate for: ^acohort TCE-exposure studies; ^bcohort chlorinated solvent-exposure studies; ^call cohort studies; CI confidence interval.

(RR = 1.03.95% CI 0.91 to 1.17: $I^2 = 7.21$: p-heterogeneity=0.78) or CLL/SLL (RR=0.98, 95% CI 0.69 to 1.41; $I^2=8.14$; p-heterogeneity=0.23) risk (see online supplementary figures S1-S4). Findings did not differ for any of the subtypes when analyses were restricted to 'TCE-exposure' cohort, case-control, or cohort and casecontrol studies combined. However for HL, a significantly increased summary estimate of 2.07 (95% CI 1.13 to 3.78; $I^2=1.22$; p-heterogeneity=0.88) was seen among the five mortality 'TCE-exposure' studies, but not among the three cancer incidence studies. Non-significant risk estimates for HL, MM, leukaemia and CLL/SLL were observed for analyses of cohort, case-control and cohort and case-control combined 'chlorinated solvent-exposure' studies. No evidence of publication bias was found for studies of HL, MM, leukaemia and CLL/SLL.

DISCUSSION

Our updated meta-analysis, evaluating NHL risk and occupational TCE exposure incorporated three recently published cohort analyses³⁹ 50 52 and four case–control studies.^{59–61} 63 Significantly increased risk estimates were seen for cohort studies overall, for those that specifically assessed TCE-exposed workers and for combined cohort and case–control 'TCE-exposure' studies. A non-significant but increased summary estimate was seen for NHL case–control 'TCE-exposure' studies. The stronger risk estimates found for 'TCE-exposure' studies compared with 'chlorinated solvent-exposure' studies suggest that the latter group might have been prone to TCE-exposure misclassification since they included broader groups of chlorinated solvents.

The raised NHL risk estimates seen in our study are consistent with review findings reported by Wartenberg *et al*, ¹⁰ Scott and Jinot, ¹⁹ and Mandel *et al*. ²⁰ In 2000, Wartenberg and colleagues first reported a borderline significant increased association for NHL in the tier 1 study group that included studies with the most extensive exposure assessment; tier 1 studies used biomarkers, JEMs, or other worksite exposure evaluations to Case 7:23-cv-00897-RJ Document 481-8

assess TCE exposure for individual study subjects. ¹⁰ With the inclusion of results from additional studies, a statistically significant increased association between occupational TCE exposure and NHL risk for cohort studies has been reported in two independent reviews. ¹⁹ ²⁰ Similar to our study, NHL risk estimates were calculated for case–control studies but no statistically significant increased pooled risk was reported by these reviews. ¹⁰ ¹⁹ ²⁰

Our review is unique in that an expert industrial hygienist classified TCE-exposure specificity while blinded to the study results; this classification allowed us to evaluate the potential effect of exposure misclassification by comparing whether summary estimates from studies that assessed TCE exposure separately differed from those that assessed exposure to the broad classifications of chlorinated solvents. The reviews by Mandel *et al*²⁰ and Scott and Jinot¹⁹ also evaluated risk among a subcohort of workers with the greatest potential for TCE exposure who, compared with all exposed workers, had a similar but slightly greater risk estimate. With the exception of one drycleaning industry study that evaluated TCE specifically, other dry-cleaning/laundry studies assessed in the Wartenberg *et al*¹⁰ review were excluded for reasons described previously.

In contrast to the most recent meta-analysis of TCE exposure and NHL risk, 19 our review integrated results from an updated cohort study with 12 additional years of follow-up.³⁹ Our study also included results from two recently published occupational cohort studies not previously assessed in previous reviews. 50 52 One of these cohorts, which was categorised as a 'chlorinated solvent-exposure' study, did not observe an increase in NHL risk.⁵² One would expect risk of TCE-related disease to be diluted in 'chlorinated solvent-exposure' studies given the increased likelihood of non-differential exposure misclassifica-Furthermore, in comparison with all previous reviews, 10 19 20 our study also incorporated data from 376 NHL cases and 463 controls in a US case-control study that assessed exposure among metal cleaning/degreasing industry workers.⁵⁵ Filed 08/24/25 Page 6 of 11

	Table 2	Summary estimates of	case-control studies	of occupational TO	E exposure and NHL	risk
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	Number of studies	RR	95% CI	Test for heterogeneity		Test for publication bias	
				l ²	p Value	p Value (Begg)	p Value (Egger)
TCE-exposed studies							
All*	9	1.14	(0.93 to 1.40)	10.51	0.23	0.14	0.01†
US studies	3	1.23	(0.95 to 1.58)	0.30	0.86	0.60	0.68
European studies	5	1.20	(0.78 to 1.84)	8.76	0.07	0.14	0.01‡
Male participant studies	3	1.65	(0.78 to 3.50)	3.92	0.14	0.12	0.08
Female participant studies	2	1.18	(0.89 to 1.58)	0.02	0.89		
Male and female participant studies	4	1.04	(0.77 to 1.38)	4.17	0.24	0.50	0.14
Low-intensity studies	3	1.06	(0.79 to 1.42)	2.49	0.29	0.60	0.82
High-intensity studies	3	1.42	(0.86 to 2.33)	1.78	0.41	0.60	0.80
Low-duration studies	2	1.46	(0.78 to 2.73)	1.62	0.20		
High-duration studies	2	1.18	(0.60 to 2.34)	0.50	0.48		
Chlorinated solvent-exposed studies							
All§	3	1.05	(0.83 to 1.33)	1.05	0.59	0.60	0.53
US studies	2	1.03	(0.79 to 1.36)	0.98	0.32		
European studies	0						
Male participant studies	1	0.91	(0.62 to 1.30)				
Female participant studies	0						
Male and female participant studies	2	1.16	(0.86 to 1.57)	0.06	0.80		
Low-intensity studies	1	1.03	(0.64 to 1.66)				
High-intensity studies	1	1.81	(0.52 to 6.23)				
Low-duration studies	0						
High-duration studies	1	0.73	(0.41 to 1.30)				
All case-control studies							
All¶	12	1.09	(0.94 to 1.25)	11.63	0.39	0.08	0.003**
US studies	5	1.13	(0.94 to 1.36)	2.10	0.72	0.62	0.42
European studies	5	1.20	(0.78 to 1.84)	8.76	0.07	0.14	0.01‡
Male participant studies	4	1.26	(0.76 to 2.10)	6.09	0.11	0.04††	0.051
Female participant studies	2	1.18	(0.89 to 1.58)	0.02	0.89		
Male and female participant studies	6	1.04	(0.87 to 1.25)	4.98	0.42	0.35	0.07
Low-intensity studies	4	1.05	(0.84 to 1.32)	2.50	0.48	1.00	0.74
High-intensity studies	4	1.47	(0.93 to 2.32)	1.91	0.59	0.34	0.91
Low-duration studies	2	1.46	(0.78 to 2.73)	1.62	0.20		
High -duration studies	3	0.89	(0.57 to 1.39)	1.60	0.45	0.12	0.01‡‡

Summary estimate for:

Given that individuals in degreasing operations are among the most heavily TCE-exposed workers,⁵ ⁷ this study was assessed as a 'TCE-exposure' study.⁵⁹ Data from three 'chlorinated solvent-exposure' studies, which included 2045 cases and 2656 population-based controls, were also assessed in our study.⁶⁰ ⁶¹ ⁶³ Unlike previous reviews, ¹⁰ ¹⁹ ²⁰ we chose to exclude the results of the Greenland et al⁵⁵ case-control study given that TCE exposure was assessed in relation to NHL and HL risk combined as opposed to NHL risk specifically.

In our NHL review, stronger risk estimates were found for cohort versus case-control studies and for incidence versus mortality studies. These findings were also seen in previously published meta-analyses of occupational TCE exposure and NHL risk. 10 19 Exposure estimates in cohort studies are more likely to have greater validity than other study designs, since investigators

can obtain site-specific exposure information reflective of historical exposures. Results from occupational cohort studies that compared cancer risk with the general population, however, may also be biased towards the null since mortality and morbidity rates within workforces are likely to be lower than those of the general population owing to the healthy-worker effect.⁶⁴ For studies that depended on death certificates as the only source of case ascertainment, a large proportion of cancer cases could be missed if survival is high and the reported cause of death differed from the cancer of interest or lacked histological information that is particularly important in studies of lymphoma owing to the heterogeneity of the disease. Compared with mortality studies, incidence studies are less likely to be biased by outcome misclassification and more accurately reflect exposure-related risk.¹¹

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^{*}Case-control TCE-exposure studies.

[†]Four studies, OR=1.04, 95% CI 0.84 to 1.28.

[‡]Three studies, OR=0.91, 95% CI 0.61 to 1.38

[§]Case-control chlorinated solvent-exposure studies.

[¶]All case–control studies. Application of the 'trim-and-fill' method added.
**Five studies, OR=1.03, 95% CI 0.89 to 1.19.

^{††}Two studies, OR=0.97, 95% CI 0.57 to 1.66.

^{‡‡}Two studies, OR=0.73. 95% CI 0.48 to 1.11.

NHL, Non-Hodgkin's Lymphoma; TCE, trichloroethylene; CI, confidence interval.

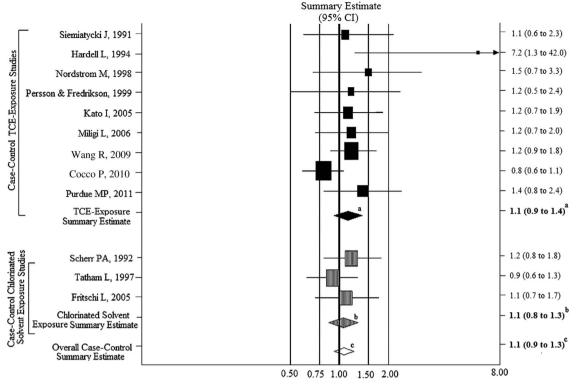


Figure 2 Summary estimates of case—control studies of occupational TCE exposure and NHL risk. NHL, non-Hodgkin's lymphoma; TCE, trichloroethylene. Summary estimate for: ^acohort TCE-exposure studies; ^bcohort chlorinated solvent-exposure studies; ^call cohort studies; CI confidence interval.

Given the attenuation of TCE use in most industries,⁴ ⁵ ⁹ stronger risk estimates were expected for earlier studies in our evaluation of NHL studies by median publication year, median of maximum number of years of follow-up, median year that follow-up was initiated and median recruitment year. Although similar risks were found between the time periods, summary estimates for more recent studies may reflect improvements in the validity and reliability of exposure assessment techniques used in occupational epidemiology.^{65–67} For assessment of low and high intensity and duration of exposure, dose–response relationships were not observed except for longer duration of exposure among 'TCE-exposure' cohort studies. Yet, given our extraction and grouping of results by duration, our findings should only be considered as a qualitative classification of a longer-exposed subgroup.

Overall, our meta-analytical review of occupational TCE exposure and risk of HL, MM, leukaemia and CLL/SLL did not disclose any significant findings. To date, only one other review has evaluated HL risk in relation to TCE exposure. 10 That review assessed results from two incidence and four mortality cohort studies. A borderline significant association was reported for incidence studies. Similar to our review, a significant twofold increased association with exposure for mortality studies was observed. Our study, however, included new analytical HL results from five additional cohort 30 31 36 39 52 and two casecontrol34 56 studies. Raised MM risk estimates were reported for both incidence and mortality cohort studies in an earlier review; but, results were based on only 10 cases from three SIR studies and 18 cases from two SMR studies, respectively. 10 The most recent review, evaluating findings from seven epidemiological studies, found no association between TCE exposure and MM risk.²¹ Similar null results were found in our MM review, now including results from six additional studies not previously evaluated. ³¹ ³² ³⁶ ³⁹ ⁵² ⁵⁸ Our study also found similar results to Case 7:23-cv-00897-RJ

those of two previous reviews that reported no association between TCE exposure and risk of leukaemia, ¹⁰ ²¹ but with the inclusion of findings from five additional cohorts. ³¹ ³⁶ ³⁹ ⁵⁰ ⁵² To our knowledge, our study is the only review to assess CLL/SLL risk in relation to occupational TCE exposure; no significant findings were found.

Increasing evidence from molecular epidemiological investigations of TCE has suggested that an association between TCE exposure and lymphoma and NHL in particular, may be biologically plausible. Exposure to TCE has demonstrated relevant immune-related effects in occupationally exposed workers, with declines in total lymphocytes and lymphocyte subpopulations including CD4 T cells and alterations in serum cytokine levels involved in immunoregulation. 12 68 Notably, immunosuppression is one of the few known risk factors for NHL and additional evidence has indicated that alterations in markers associated with immune regulation, such as cytokines and immune activation biomarkers, are related to NHL risk and/or progression.^{69–71} Moreover, animal and human studies have indicated a role for TCE in the development of autoimmunity.⁷² Associations with several autoimmune conditions, NHL and particular subtypes have been described.⁷³ Collectively, findings indicate that exposure to TCE may result in immune-related changes that are associated with NHL in other settings and disease contexts and provide plausibility for the association seen in our study.

Although a strength of our review is the way in which we classified studies by TCE-exposure assessment specificity, assuming that greater specificity minimised potential TCE-exposure misclassification, exposure assessment limitations must be acknowledged. Studies that estimated exposure based solely on job titles or JEMs were limited in that exposure might have varied considerably among individuals in the same industry or among those with the same job title. While the NHL risk Document 481-8

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estimate was significant raised for urinary biomonitoring studies of individual study subjects, ²² ⁴¹ ⁴⁷ most of these studies lack subject-specific exposure measurements. In contrast, biomarkers studies may not capture long-term exposure levels that are relevant to cancer studies, particularly if the monitoring was conducted at a single moment or a few points in time. Also, exposure to other chemicals may alter, modify, or confound urinary biomonitoring measurement. Findings from previous meta-analyses have always been questioned owing to concerns about exposure misclassification and unmeasured confounding. However, these factors would probably bias risk estimates towards the null, as exposure misclassification is typically nondifferential. In order for unmeasured confounding to truly affect results, associations between the confounding factor and both the disease and the exposure of interest must be strong.⁷⁴ In most occupational epidemiological studies, such relationships are extremely rare, although we acknowledge that results might be biased away from the null by chance. Other limitations include the likelihood of selection bias among studies that did not match controls to cases, and the chance of outcome misclassification for studies lacking histologically confirmed cancers. Subgroup-specific risk estimates in our review might have been underpowered given the limited number of TCE-exposed cases for rare cancers, such as CLL/SLL. Finally, publication bias in meta-analyses may potentially skew positive results away from the null, though this type of bias did not appear to be a major concern in our review.

In summary, our meta-analysis differentiated between studies that assessed TCE exposure specifically and those that evaluated exposure to broader groups of chlorinated solvents, demonstrating that reduced TCE-exposure misclassification strengthened the association between exposure and risk. Our updated NHL meta-analysis incorporated analytical results from seven additional studies (three 'TCE-exposure' and four 'chlorinated solvent-exposure' studies) and supports an association between occupational TCE exposure and NHL risk, particularly for cohort studies. Our meta-analytical findings for TCE exposure and NHL risk still warrant further exploration given the limited dose–response patterns observed in our review and the recent conclusion by IARC that the carcinogenic evidence for TCE and NHL is limited.² Assessment for leukaemia and other lymphoid neoplasms also merits additional investigation.

Contributors All authors included on this paper fulfil the criteria of authorship. **Competing interests** None.

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Occupational trichloroethylene exposure and risk of lymphatic and haematopoietic cancers: a meta-analysis

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