

20225- Gas Stove Emissions Are a Public Health Concern: Exposure to Indoor Nitrogen Dioxide Increases Risk of Illness in Children, Older Adults, and People with Underlying Health Conditions

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2 **Gas Stove Emissions Are a Public Health Concern: Exposure to Indoor Nitrogen Dioxide Increases**  
3 **Risk of Illness in Children, Older Adults, and People with Underlying Health Conditions**  
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7  
8 **Abstract**

9 “Natural” gas stoves generate a number of harmful air pollutants, with nitrogen dioxide (NO<sub>2</sub>) most  
10 consistently identified in the scientific literature. Multiple high-quality scientific studies have shown that  
11 NO<sub>2</sub> concentrations are higher in homes that use gas stoves and that cooking with gas stoves without  
12 ventilation can result in home NO<sub>2</sub> concentrations that are above the ambient air quality standards of the  
13 Environmental Protection Agency (EPA). The EPA has determined that NO<sub>2</sub> is “causal” of more severe  
14 respiratory symptoms in people with asthma and that long-term exposure to NO<sub>2</sub> is “likely causal” of  
15 respiratory illnesses such as asthma. Furthermore, epidemiological studies have shown that gas stoves are  
16 associated with an increased risk of asthma in children as well as more severe asthma symptoms. Despite  
17 this evidence, few safeguards are in place to protect the health of the public from gas stove emissions,  
18 particularly in overburdened and underserved communities. While comprehensive federal law regulates  
19 outdoor air quality in the United States, there are no federal indoor air quality guidelines, and few state or  
20 local policies address indoor air pollution. Those living in smaller, older, less ventilated homes are at  
21 higher risk of the effects of indoor air pollutants from a variety of sources, introducing a disproportionate  
22 risk of illness among lower-income populations and people of color. Along with other healthy home  
23 improvements, health experts should advocate for an equitable, multipronged approach to combat indoor  
24 air pollution from gas stoves, including policy change, program development, education about emission  
25 mitigation, and investment.

26  
27 **Relationship to Existing APHA Policy Statements**

28 The following existing APHA policy statements support this proposed policy statement by addressing  
29 issues and topics related to air pollution, respiratory disease, gas, energy policy, climate change, and  
30 health equity.

- 31 ● APHA Policy Statement 201711: Public Health Opportunities to Address the Health Effects of  
32 Air Pollution
- 33 ● APHA Policy Statement 20183: The Public Health Impacts of Energy Policy in the United States

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- 34 ● APHA Policy Statement 20197: Addressing Environmental Justice to Achieve Health Equity
- 35 ● APHA Policy Statement 20157: Public Health Opportunities to Address the Health Effects of
- 36 Climate Change
- 37 ● APHA Policy Statement 20125: The Environmental and Occupational Health Impacts of High-
- 38 Volume Hydraulic Fracturing of Unconventional Gas Reserves
- 39 ● APHA Policy Statement 20046: Affirming the Necessity of a Secure, Sustainable and Health
- 40 Protective Energy Policy

41 This proposed policy statement is also consistent with several archived policy statements: 200017  
42 (Confirming Need for Protective National Health Based Air Quality Standards), 200012 (Reducing the  
43 Rising Rates of Asthma), and 8912 (Public Health Control of Hazardous Air Pollutants).

44

45 In addition, APHA is a signatory on the U.S. Call to Action on Climate, Health, and Equity: A Policy  
46 Action Agenda (2019), which calls for a “transition away from wood burning, oil, and natural gas use for  
47 home heating and cooking.”

48 Problem Statement

49 Gas stoves (gas cooktop and oven combinations, interchangeably called gas ranges) are common  
50 household appliances across the United States. However, burning gas (i.e., combustion) creates harmful  
51 nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM<sub>2.5</sub>), carbon monoxide (CO), formaldehyde (CH<sub>2</sub>O), and  
52 methane (CH<sub>4</sub>) pollution and has been increasingly linked to poor health outcomes at lower  
53 concentrations over the past 10 years.[1] The Environmental Protection Agency (EPA),[2] Health  
54 Canada,[3] and the World Health Organization (WHO)[4] have all revised their assessments of NO<sub>2</sub>'s  
55 health impacts in the last decade. Despite these revised health assessments, routine exposure from gas  
56 stoves remains an underrecognized health threat to residents.[5]

57

58 The most consistent evidence of gas stove pollution in the literature regards NO<sub>2</sub> emissions because  
59 electric stoves do not emit NO<sub>2</sub>, which is an established marker for gas combustion.[6] Indoor NO<sub>2</sub>  
60 emissions from gas stoves can exceed indoor/outdoor concentration guidelines set by WHO and outdoor  
61 standards set by the EPA.[7] According to EPA estimates, households where gas stoves are used for  
62 cooking have between 50% and 400% higher levels of NO<sub>2</sub> than those with electric stoves.[8] Higher  
63 concentrations of NO<sub>2</sub> from gas stoves are associated with longer cooking times,[9,10] pilot  
64 lights,[9,11,12] and lack of ventilation.[9,13,14] A Lawrence Berkeley National Laboratory modeling  
65 study of homes in southern California estimated that during the winter, when ventilation in homes is  
66 lowest, 51% to 64% of homes using gas cooking stoves regularly experience indoor NO<sub>2</sub> levels that

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67 exceed health-based outdoor air standards.[15] A study of in-home cooking practices in nine homes  
68 produced findings consistent with these modeling results, with four of the nine homes exceeding the  
69 National Ambient Air Quality Standards (NAAQS) for NO<sub>2</sub> when cooking without ventilation.[13]

70

71 Gas stoves are an important source of personal NO<sub>2</sub> exposure. People in the United States spend about  
72 65% of their time in their place of residence and about 90% of their time indoors.[16] In a study of 18  
73 cities and 15 countries, including Boston in the United States, NO<sub>2</sub> concentrations were measured in  
74 indoor and outdoor environments and compared with personal exposures. Personal exposures to NO<sub>2</sub>  
75 were more strongly correlated with indoor NO<sub>2</sub> concentrations than with outdoor concentrations. The  
76 most influential activity affecting personal exposure was using a gas stove in the home, with a 67%  
77 increase in mean personal NO<sub>2</sub> exposure.[17] In another study in which pediatric asthma patients were  
78 equipped with home-based NO<sub>2</sub> sensors, researchers found that patients in homes with gas stoves had a  
79 higher frequency of acute NO<sub>2</sub> exposures than patients in homes without gas stoves and that these acute  
80 exposures were positively correlated with hospital admissions.[18]

81 In 2020, about a third of Americans cooked primarily with gas.[19] The prevalence of gas stoves varied  
82 across incomes nationally; the prevalence was highest among the highest-earning households and lowest  
83 among households earning less than \$20,000.[19] There is also variability by region. Gas stove  
84 prevalence rates are higher in California, the Northeast, and the Midwest than in the South.[19] While  
85 lower-income households are less likely to use gas stoves on a national scale, a study conducted in  
86 Baltimore revealed a gas stove prevalence rate of 83% in homes occupied by low-income  
87 populations.[20]

88

89 NO<sub>2</sub> exposure from gas stove emissions and health risks to children: The EPA has long recognized that  
90 NO<sub>2</sub> is associated with respiratory illnesses such as asthma, but in 2016 the agency changed the  
91 classification of short-term NO<sub>2</sub> exposure from “likely causal” to “causal” of asthma attacks and long-  
92 term NO<sub>2</sub> exposure to “likely causal” of the development of asthma.[2] A 2013 meta-analysis conducted  
93 by Lin et al. showed that children residing in homes with gas stoves have a 42% higher risk of current  
94 asthma and a 24% higher lifetime risk of asthma than children living in homes with electric stoves.[21]  
95 This is a comparable risk to a child living with a smoker in the home.[22] In the meta-analysis, 11 studies  
96 were included in the assessment of gas stoves and risk of current asthma, three of which were from North  
97 America. The results varied only minimally between regions, suggesting that the findings are externally  
98 valid for North America.[21]

99

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100 The association between gas stoves and increased asthma incidence in children is consistent with NO<sub>2</sub>'s  
101 physiological effects. Biologically, children are more susceptible to air pollution because of developing  
102 lungs and immune systems, higher breathing rates, and propensity to breathe through their mouths.[23]  
103 Exposure to NO<sub>2</sub> in children is negatively correlated with healthy lung function.[23] Cooking with gas  
104 has also been shown to reduce lung function up to 3.4% in children.[24] Controlled human exposure  
105 studies in healthy adults (not available for children) show development of an allergic phenotype and  
106 increased airway responsiveness at high levels of NO<sub>2</sub> (1,000 parts per billion [ppb]), both of which are  
107 associated with the development of asthma.[2]

108

109 Indoor NO<sub>2</sub> at concentrations well below EPA outdoor health standards are associated with an increased  
110 risk of asthma symptoms in asthmatic children. A prospective study of young children (2–6 years of age)  
111 with an asthma diagnosis reported a dose-dependent increase in asthma symptoms among children in  
112 Baltimore. A 20-ppb increase in NO<sub>2</sub> levels was associated with statistically significant increases in  
113 asthma symptoms after adjustment for confounders (including age, sex, race, caregiver educational level,  
114 season of sampling, PM<sub>2.5</sub> exposure, and secondhand smoke exposure). Additional analyses were done to  
115 ensure that the effects of indoor NO<sub>2</sub> were independent of ambient NO<sub>2</sub> levels.[20] A prospective study of  
116 more than 1,000 asthmatic children (5–10 years of age) conducted in Massachusetts and Connecticut also  
117 revealed a dose-response relationship above a 6-ppb threshold; every 5-ppb increase in NO<sub>2</sub> levels was  
118 associated with a dose-dependent increase in the risk of asthma severity. Models were adjusted for age,  
119 sex, atopy, season of monitoring, race/ethnicity, mother's education, smoking in the home, and  
120 sensitization and exposure to indoor allergens.[12] Similarly, the 2013 Lin et al. meta-analysis showed  
121 that higher levels of indoor NO<sub>2</sub> (20 ppb) were associated with a 15% increased risk of wheezing in  
122 children (the meta-analysis results were adjusted for confounding factors, including smoking in the  
123 family).[21]

124

125 While no studies have yet explored the impact of the removal of gas stoves on asthma severity or asthma  
126 incidence, reductions in NO<sub>2</sub> in ambient air in Los Angeles were assessed in a multilevel longitudinal  
127 cohort drawn from the Southern California Children's Health Study. More than 4,000 children with no  
128 history of asthma were included in the study. The authors reported that with an annual median NO<sub>2</sub>  
129 reduction of 4.3 ppb, the incidence rate declined by 0.83 cases per 100 person-years.[25] In addition, a  
130 randomized study showed that when gas stoves were replaced with electric stoves, median NO<sub>2</sub> levels  
131 were 51% lower, falling from a median concentration of 19.7 ppb in homes with a gas stove to 9.7 ppb in  
132 homes that received an electric stove.[11] Further research is currently being conducted to build evidence

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133 for the health co-benefits of gas stove removal in affordable housing units. The community group WE  
134 ACT for Environmental Justice is leading a pilot study, Out of Gas, In with Justice, that is replacing gas  
135 stoves with induction stoves and measuring health benefits in 20 affordable housing homes in New  
136 York.[26] Also, the California Energy Commission is funding a \$4 million randomized control trial to  
137 investigate the impact of gas stove interventions on children with asthma.[27]

138  
139 NO<sub>2</sub> exposure from gas stove emissions and health risks to older adults: Negative health effects from gas  
140 stoves among healthy adults have been inconsistently reported. This conforms with studies of the effects  
141 of air pollution; children are more biologically sensitive to air pollution than healthy adults. There are  
142 currently no studies of the health effects of cooking with gas stoves among older adults (typically  
143 considered those 65 years or older). However, older adults are more sensitive than younger adults to NO<sub>2</sub>.  
144 Increased age is associated with a greater risk of weakened immune function, impaired healing,  
145 decrements in pulmonary and cardiovascular function, and a higher prevalence of chronic disease. The  
146 EPA found that older adults had more NO<sub>2</sub>-related asthma hospital admissions and emergency department  
147 visits and concluded that “older adults are at increased risk for NO<sub>2</sub>-related health effects.”[2] Short-term  
148 NO<sub>2</sub> exposure, as well as long-term exposure to low levels of NO<sub>2</sub>, is correlated with higher overall  
149 mortality rates among older adults.[2,28]

150  
151 NO<sub>2</sub> exposure from gas stove emissions and environmental justice concerns: Low-income communities  
152 and communities of color are at much greater risk of harm from indoor pollution caused by gas stoves. A  
153 recent study conducted by the National Center for Healthy Housing (NCHH) and Enterprise Community  
154 Partners revealed that 90% of rental homes did not have adequate ventilation to remove gas stove  
155 emissions and recommended removing gas stoves.[14] Another study showed that gas stove pollution was  
156 highest in multi-unit buildings.[10] Because of the long history of housing discrimination, communities of  
157 color are disproportionately renters living in smaller spaces. Renters often have little or no control over  
158 the fuel type or quality of their appliances and frequently lack the financial means or property owner  
159 permission to choose an electric stove and ensure high-quality ventilation. This combination of  
160 circumstances means that low-income renters are often using older stoves that are not adequately  
161 ventilated, resulting in a higher concentration of pollutants indoors.[29] In addition, individuals have  
162 greater exposure to gas combustion pollutants when they use gas ovens to supplement their home  
163 heating.[30] Low-income communities and communities of color are already living with higher levels of  
164 outdoor air pollution[31]; their consequent health disparities may be further exacerbated by cumulative  
165 exposures to pollution from indoor sources such as gas stoves.

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166

167 Lack of policies and programs addressing gas stoves and indoor air quality: While outdoor air pollution  
168 has received much policy attention, indoor air pollution—including that caused by gas appliances—is  
169 entirely unregulated at the federal level. Unlike Canada and WHO, the EPA does not establish health  
170 standards or guidelines for indoor air quality. While the EPA does not currently issue air quality  
171 guidelines, it does recommend American National Standards Institute (ANSI)/American Society of  
172 Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 62.2 (which details whole-  
173 home ventilation guidelines for acceptable indoor air quality[32]) in a number of its guidelines for  
174 construction, including Indoor AirPLUS construction specifications[33] and single-family[34] and  
175 multifamily renovations.[35] Similar to the EPA, the U.S. Department of Housing and Urban  
176 Development (HUD) does not regulate indoor air quality in its buildings, although it recommends using  
177 ANSI/ASHRAE Standard 62.2. It also establishes smoke-free policies in public housing and multifamily  
178 properties funded by HUD.[36] The U.S. Air Force does indoor air quality building inspections and  
179 recognizes that combustion can cause NO<sub>2</sub> pollution. It recommends venting combustion appliances if  
180 NO<sub>2</sub> levels are above the NAAQS.[37] In contrast to other gas appliances, which must be externally  
181 vented according to building codes, there is a lack of consistent regulation of gas stove ventilation. Some  
182 state and local new construction building codes may require more ventilation through the adoption of  
183 voluntary ANSI/ASHRAE standards that can reduce gas stove pollution but do not eliminate it.[14] Some  
184 jurisdictions (Washington State, New York City, the District of Columbia, and 60 cities in California and  
185 towns in Oregon and Colorado) have also recently established building codes that require installation of  
186 electric appliances in new construction,[38] but otherwise indoor air pollution is not regulated at the state  
187 or local level.

188

189 Several existing healthy homes programs address ventilation of gas stoves but do not warn people about  
190 gas stove emissions and their association with respiratory illnesses or provide emission reduction  
191 strategies beyond ventilation. Examples include HUD's Healthy Homes Principles,[39] the EPA's  
192 Asthma Home Environment Checklist,[40] and the CDC's Healthy Housing Reference Manual.[41]  
193 These interventions depend on people understanding the health risks gas stoves pose and regularly using  
194 an exhaust hood vented outdoors. However, building codes do not uniformly require adequate  
195 ventilation,[14] and current data suggest that most people do not use ventilation regularly.[11,42,43]

196

197 The costs of transitioning to electric stoves, both at a household and a national level, will require large-  
198 scale policy changes and government investments to ensure a just transition away from gas cooking.

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199 Stoves are a crucial piece of kitchen equipment that support household nutrition, and given that many  
200 households lack the financial means or property owner permission to choose an electric stove, we must  
201 simultaneously advocate for and ensure access to other lower-cost, shorter-term solutions that help  
202 mitigate indoor cooking pollution. Additional research on the health harms of gas stoves and assessments  
203 of the available health interventions will help support this advocacy and policy change.

204

205 Evidence-Based Strategies to Address the Problem

206 As with successful public health programs and policies that have reduced exposure to household  
207 smoke[44] and radon,[45] reducing exposure to gas stove pollution will require a multipronged approach  
208 that includes indoor air quality guidelines, education of consumers and the public health and medical  
209 community, uptake of exposure reduction strategies, and creation of new policies and programs.

210

211 Indoor air quality guidelines: More policy attention should focus on indoor air pollutant guidelines. While  
212 the Clean Air Act requires the EPA to set NAAQS for common air pollutants outdoors,[46] there are no  
213 similar standards or guidelines for indoor air, resulting in less regulation and consequent unsafe levels of  
214 indoor pollution. The Clean Air Act has successfully reduced levels of U.S. outdoor air pollution and  
215 prevented hundreds of thousands of early deaths and millions of cases of health effects,[47]  
216 demonstrating the benefits of such standards. Although EPA indoor air quality guidelines would not have  
217 the same legal force under the Clean Air Act as EPA’s NAAQS, they would play a valuable role in  
218 informing consumers about risks related to indoor air pollution and helping state regulators and voluntary  
219 standard-setting bodies assess these risks. Similarly, the EPA develops criteria for determining  
220 when surface water is unsafe for people and wildlife. State and tribal governments can use these criteria to  
221 develop their own guidance and regulations.[48] Health Canada[3] and WHO[4] have both set indoor air  
222 quality guidelines to guide health-based assessments. States do not regulate indoor air quality but can set  
223 indoor air quality guidelines. The California Air Resources Board (CARB) passed a resolution in 2020  
224 supporting the electrification of appliances and citing the “urgent need to update CARB’s indoor air  
225 pollution guidelines to provide agencies, researchers, and the public guidance on safe levels for indoor air  
226 pollutant exposures.”[49]

227

228 Exposure reduction strategies: Replacing existing gas stoves with electric or induction stoves is the most  
229 effective strategy for gas stove emissions mitigation. In a randomized study that explored the intervention  
230 options of ventilation, running an air purifier, or switching to electric stoves, electric stoves improved air  
231 quality the most, reducing the median kitchen concentration of NO<sub>2</sub> by 51% and the bedroom

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232 concentration by 42%. [11] The switch to an electric stove is often most feasible in new construction and  
233 at the end of existing gas stoves' life, when replacement is already needed, although some households  
234 (i.e., those with the financial means and control over their environment) may choose to replace sooner  
235 than that for immediate benefits to their indoor air. There are cases in which a complete replacement is  
236 not feasible, such as lack of financial means or property owner permission or structural limitations posed  
237 by limited electrical panel capacity. In these cases, households may choose to shift some of their cooking  
238 from a gas stove to other small electric appliances they already own, such as microwave ovens, electric  
239 kettles, and toaster ovens.

240

241 When implemented correctly, filtration may be an effective and lower-cost strategy to mitigate indoor air  
242 pollution from gas appliances already present in homes across the nation. [50] In the same randomized  
243 interventional study described above, installing a ventilation hood was not shown to significantly change  
244 NO<sub>2</sub> concentrations from gas stove use. However, high-efficiency particulate absorbing air purifiers with  
245 carbon filters placed in kitchens with gas stoves resulted in a 27% reduction in median kitchen NO<sub>2</sub> levels  
246 and a 20% reduction over 3 months. [11]

247

248 Ventilation may be a strategy to reduce gas emissions, but it has limitations. There are two types of  
249 ventilation: whole-home/whole-building ventilation and source ventilation (e.g., exhaust hood).  
250 ANSI/ASHRAE Standard 62.2 details whole-home ventilation guidelines for acceptable indoor air  
251 quality. [32] In an NCHH study of ANSI/ASHRAE Standard 62.2 in comparison with standard  
252 ventilation, whole-building ventilation was shown to reduce PM<sub>2.5</sub> and carbon monoxide from gas stoves.  
253 However, it was inadequate to expel NO<sub>2</sub> pollution. The researchers concluded that, to ensure healthy  
254 indoor air quality, gas stoves should be removed from homes. [14] Source ventilation can remove gas  
255 stove emissions but is not as effective as whole-home ventilation. Many people do not frequently use  
256 source ventilation; one survey revealed that respondents used their exhaust hoods only a third of the time,  
257 citing noise and forgetfulness. [42] The hoods currently on the market also vary in effectiveness. Many  
258 hoods do not vent to the outdoors and simply circulate pollutants around the home, and most fail to  
259 capture more than 75% of pollutants. [43] In a study of households that reported using ventilation,  
260 children had better lung function and lower odds of respiratory symptoms. [30] Residents with gas stoves  
261 and without proper exhaust ventilation can ventilate naturally by opening doors and windows while  
262 cooking if weather, outdoor air quality conditions, and window operability permit. Considering the  
263 NCHH observation that ventilation is not sufficient to remove NO<sub>2</sub>, [14] whole-home and source  
264 ventilation should be paired with other strategies that remove gas stoves or reduce their use.

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265

266 Education: An effective way to inform the public of the risk of gas stove emissions and effective  
267 remediation strategies is to require disclosures at the point of sale or when rental and lease agreements are  
268 signed. Thirty-seven states require the presence of radon to be disclosed during real estate transactions,  
269 and four states require tenant disclosures.[51] HUD requires information about radon be provided for all  
270 Federal Housing Administration insured forward mortgages. This requirement is estimated to reach  
271 millions of people buying homes. When HUD-acquired single-family properties are sold, buyers receive  
272 information about the health harms of radon and mold as part of a release agreement and receive  
273 information about home repairs that can help minimize them. The home repairs suggested to mitigate  
274 radon are recommendations without associated funding to make the repairs.[52]

275

276 Education and recommendations on gas stove emissions control strategies beyond ventilation could be  
277 added to the outreach materials created by the EPA, HUD, and the CDC. Similarly, health profession  
278 curricula could better address environmental health risks such as gas stoves. Together, these education  
279 strategies could play a role in public education about gas stove emissions and mitigation.

280

281 CDC's EXHALE program recommends implementing six strategies to reduce asthma symptoms and uses  
282 health care visits in a home-based program to educate people caring for children with asthma about  
283 multiple asthma triggers. The Community Preventive Services Task Force recommends home-based  
284 multitriggger, multicomponent interventions with environmental remediation because they reduce  
285 symptoms and medical care needs and because they are cost effective.[53] These programs cover  
286 information on issues such as secondhand smoke and pest management.[54] Outreach workers could also  
287 provide information about unventilated gas stoves and offer low-cost remediation strategies that pair  
288 ventilation with source control based on individual household resources (e.g., presence of ventilation,  
289 operational windows, other electric appliances).

290

291 Other policy levers: Another policy lever is to better regulate gas stoves and ventilation. The Institute for  
292 Policy Integrity at the New York University School of Law, citing health-harming emissions of gas  
293 stoves, recently called upon the Consumer Product Safety Commission (CPSC) to develop mandatory  
294 performance standards for gas stoves and range hoods, require warning labels for gas stoves, and educate  
295 the public about the harms of gas stove emissions. These actions are within the agency's existing statutory  
296 authority.[55]

297

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298 Air quality guidelines and nongovernmental standards, such as the internationally recognized  
299 ANSI/ASHRAE Standards 62.1 and 62.2,[32] can also be used to guide state and local building codes.  
300 Building codes can establish indoor pollutant concentration limits based on air quality guidelines and  
301 require effective ventilation aligned with ANSI/ASHRAE standards. The 2020 ASHRAE Position  
302 Document on Unvented Combustion Devices and Indoor Air Quality[56] specifically called for more  
303 research to investigate the effects of gas cooking combustion on indoor air quality in residential and  
304 commercial buildings, especially concerning NO<sub>2</sub>, as well as a review and update of appliance standards  
305 and a revision of product information to include the risk of extended use.

306

307 Government-funded new construction and retrofits: The Boston Department of Neighborhood  
308 Development requires developers receiving funds from the city for new construction affordable housing  
309 projects to build to a zero emissions standard with respect to electric appliances.[57] Electrification  
310 programs focusing on retrofitting existing buildings are also becoming more popular across the United  
311 States,[58] and the replacement of gas stoves could potentially be an additional element of these  
312 programs. California and Philadelphia combined a variety of government funding sources to address the  
313 core components of a healthy home into one program. “One-stop-shop” models such as these provide  
314 funding for whole-home retrofits and address four key components: health and safety, weatherization and  
315 energy efficiency, appliance electrification, and energy assistance.[59] Maine has a successful heat pump  
316 adoption program that covers the cost of heat pumps for low-income residents and provides tiered rebate  
317 financing. Maine’s program resulted in 25% to 30% growth in uptake of heat pumps in each of the past 3  
318 years.[60] This model could be applied to electric stoves, prioritizing installation in low-income homes.  
319 To minimize displacement that may result from building upgrades, government agencies can protect  
320 renters by including stipulations on electrification funding. A recent report focused on Los Angeles  
321 identified several housing policies that can be used to minimize the impact of building electrification and  
322 efficiency programs on renters. These policies included prohibiting pass-through costs for  
323 decarbonization retrofits to affordable housing tenants and targeting decarbonization subsidies to low-  
324 income communities. In addition, local municipalities can strengthen tenant’s rights laws.[61]

325

326 Other programs: ENERGY STAR, a national program administered by the EPA, rates the efficiency of  
327 appliances and has been successful in reducing energy consumption from appliances.[62] Some states  
328 provide rebates for ENERGY STAR rated appliances, and ENERGY STAR appliances are required for  
329 several green building certification programs, including the U.S. Green Building Council’s Leadership in  
330 Energy and Environmental Design (LEED) certification program. Electric stoves and induction stoves are

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331 more efficient than gas stoves,[63] and adding electric and induction stoves to the ENERGY STAR  
332 program may help create a preference for them. Some governments, as part of local zoning laws or  
333 building codes, require LEED certification for building permits, suggesting that providing ENERGY  
334 STAR ratings could help with the uptake of electric stoves in new building construction.

335

### 336 Opposing Arguments/Evidence

337 One opposing argument is that there are no stated risks to respiratory health from regulatory and advisory  
338 agencies and organizations responsible for consumer health and safety. On the contrary, the EPA and  
339 CPSC have been aware of and have publicized health risks of combustion appliances in buildings for  
340 more than 35 years.[64] The EPA currently recommends source control for gas stoves (i.e., proper  
341 adjustment) and ventilation to the outdoors to reduce exposure to indoor air pollution.[65] Through its  
342 indoor air quality guidelines, the agency recommends whole-home ventilation according to  
343 ANSI/ASHRAE Standard 62.2 and further recommends that occupants be educated about the importance  
344 of using ventilation in the kitchen and bathroom. One of the leading medical associations in the United  
345 States, the American Medical Association, passed a resolution in 2022 recognizing the associations  
346 among gas stoves, indoor NO<sub>2</sub> concentrations, and pediatric asthma.[66]

347

348 A small number of studies and reports also refute the evidence on the health risks of gas stoves. In one  
349 global survey study, no association was found between gas cooking and lifetime or current asthma among  
350 children.[67] However, this single study was not based on measured concentrations of NO<sub>2</sub> in the home;  
351 rather, it was based on a self-reported global survey of household cooking fuels and asthma symptoms in  
352 which the respondents were children 13–14 years of age and parents of children 6–7 years of age.

353 Because the study combined data from 31 countries, differences across countries in housing  
354 characteristics, ambient temperatures, ventilation, and other factors may have masked the association  
355 between gas cooking and asthma. Without better isolation among geographies, types of housing, and  
356 ventilation, it is problematic to assume that this study's global findings are applicable to the United  
357 States.

358

359 A 2021 report sponsored by the California Restaurant Association (CRA) critiqued a 2020 report by the  
360 University of California, Los Angeles (UCLA), on indoor and outdoor pollution from gas appliances.[68]  
361 The CRA's arguments primarily addressed the UCLA study's modeling assumptions and scenarios as  
362 opposed to the actual public health impacts reported. The UCLA study was not included in this policy  
363 statement, but a few CRA assertions are discussed here because they have been raised elsewhere. In

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364 addition to arguments around the cost and effectiveness of ventilation, the CRA report asserts that indoor  
365 air pollution is more a function of what is being cooked than what fuel is used. In response to that claim,  
366 there are several pollutants emitted from gas that are not emitted from cooking food or from using electric  
367 stoves, namely NO<sub>2</sub>, carbon monoxide, and formaldehyde. Cooking food inevitably produces PM<sub>2.5</sub>,  
368 which is why ventilation is still recommended even when an electric stove is used. However, replacing a  
369 gas stove with an electric stove will remove the source of NO<sub>2</sub> and other health-harming combustion  
370 pollutants. It will also remove some PM<sub>2.5</sub>, as research shows that gas stoves can produce twice as much  
371 PM<sub>2.5</sub> as electric stoves.[69] In addition, gas stoves produce higher concentrations of ultrafine particles  
372 even when no cooking activities take place.[70]

373  
374 Concerns about consumer costs of replacing gas stoves and installing ventilation or filtration are often  
375 raised as reasons why the public health implications of gas stoves cannot be prioritized. The priority of a  
376 public health program is to recognize a problem. Funding for secondhand smoke education programs  
377 followed the medical and scientific community's recognition of health harms. As with radon programs,  
378 information can be given to consumers about the health effects of gas stoves without the obligation to  
379 replace every gas stove in use. The cost of replacing a gas stove with an electric stove (a \$650 average  
380 cost plus an installation cost of \$100–\$200)[71] is similar to average radon remediation costs (\$771–  
381 \$1,179).[72] However, the upfront cost of the stove, ventilation, and filtration technology, as well as the  
382 operating costs (including utility bills), can be minimized. In new buildings, all-electric homes are often  
383 less expensive to construct than all-gas homes or homes with a mix of fuels.[73] In the case of existing  
384 homes, state or local programs can offer point-of-purchase rebates for electric or induction stoves and  
385 ventilation and filtration devices through energy efficiency programs. For example, MassSave offers  
386 rebates for ENERGY STAR rated appliances.[74] While rebate programs are least effective for renters,  
387 they do meet the needs of middle-income homeowners. State-funded electrification programs could offer  
388 electric or induction stoves and ventilation and filtration devices according to a means-tested benefits  
389 scale, as Maine has done with heat pumps.[60] Although electricity currently costs more than gas for  
390 many consumers, electric stoves are more efficient than gas stoves, meaning that once the electric stove  
391 has been installed, the annual energy cost differential of operating an electric stove is minimal and should  
392 not burden low-income households.[63] In contrast, the average cost of an asthma diagnosis in a  
393 household is estimated to be more than \$3,000 a year, illustrating the importance of quantifying the health  
394 care costs of gas stoves.[75]

395

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396 Concerns that tenants could be displaced after upgrades have been made to homes are not unique to  
397 replacing gas stoves. They are legitimate concerns for all building improvement programs, including  
398 energy efficiency and electrification programs. States and municipalities should be encouraged to develop  
399 a suite of anti-displacement policies to complement funding for building upgrades and include  
400 stipulations on funding to minimize displacement.[61]

401  
402 Consumer preference for gas stoves has been suggested as a reason not to adopt electric stoves. However,  
403 consumer preference is largely driven by advertising. Surveys have shown that people have no preference  
404 for whether gas or electricity heats their home, so the gas industry has focused on marketing gas stoves to  
405 sell more gas for entire homes.[76] While marketing campaigns may claim that gas stoves provide a  
406 better cooking experience, Consumer Reports compared various gas and electric stove models and found  
407 that electric stoves outperformed gas.[77] A study that considered the efficiency of gas stoves in  
408 comparison with electric and induction stoves revealed that gas stoves were least efficient.[63] Recent  
409 polling data show that gas stove interest has declined by 5%.[78]

410  
411 For people in substandard housing, replacing a gas stove may not be a household priority. None of the  
412 recommended interventions require anyone to prioritize switching out a gas stove over radon, mold, or  
413 lead abatement or other household priorities. As with national radon education programs, educating  
414 consumers about gas stove emissions allows some people (i.e., those who have the financial means and  
415 control over their environment) to make choices based on their specific circumstances. Many mitigation  
416 strategies do not require any investment, including using other appliances or opening windows, or require  
417 minimal investment, such as using induction burners that plug into existing electrical outlets (estimated to  
418 cost less than \$100).

419  
420 Instead of asking households to prioritize, the recommendation is that electrification be included in a suite  
421 of healthy home upgrades. Electrifying appliances are often excluded from typical weatherization and  
422 energy efficiency programs. One solution (as noted) is to create one-stop-shop models for whole-home  
423 retrofits that address health and safety, weatherization and energy efficiency, appliance electrification,  
424 and energy assistance. This solution is being successfully modeled in California and Philadelphia, where  
425 unique funding sources are combined.[59]

426  
427 Action Steps

428 Based on this evidence, APHA:

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- 429 1. Calls upon the EPA, HUD, and the CDC to formally recognize the links among gas stove  
430 emissions, NO<sub>2</sub> pollution, and increased risk of illness in children, older adults, people with  
431 underlying conditions, and environmental justice communities. Furthermore, the public and  
432 health care practitioners should be educated on the health harms of gas stove emissions and  
433 promotion of mitigation solutions should be expedited.
- 434 2. Calls upon the EPA to set health-protective indoor air quality guidelines for all indoor residential  
435 settings, drawing on the Clean Air Act and the current EPA recommendations to utilize  
436 ANSI/ASHRAE Standard 62.2 in indoor air quality guidance in new construction specifications  
437 and renovations.
- 438 3. Calls upon the EPA to support the 2020 ASHRAE position document, which recommended  
439 additional research on gas stove emissions, review of appliance standards, and revision of product  
440 information.
- 441 4. Calls upon the CPSC to set mandatory or voluntary performance standards for gas stoves and  
442 range hoods and to launch a public awareness campaign.
- 443 5. Calls upon state legislatures and HUD to require disclosure during real estate transactions and  
444 tenant disclosures that gas stoves emit harmful levels of pollutants without proper ventilation and  
445 to provide source control and mitigation strategies for improving air quality (similar to the  
446 approach for radon education programs).
- 447 6. Calls upon HUD to adopt policies with preferences for the installation of electric appliances in  
448 new and retrofitted buildings that are federally funded. Furthermore, HUD should update its  
449 Healthy Homes program to provide educational information about gas stove emissions and  
450 mitigation strategies, including source control and ventilation.
- 451 7. Calls upon public and affordable housing agencies and providers, including those receiving HUD  
452 funding, to develop and implement strategies to ensure that residents do not experience unsafe  
453 levels of gas stove pollution. New units and retrofitted units can be fitted with appropriate  
454 ventilation, filtration, and electric stoves.
- 455 8. Calls upon state and local authorities responsible for building codes to legislate the inclusion of  
456 whole-home ventilation and outdoor-venting exhaust hoods in all new buildings and remodels,  
457 adhering to ANSI/ASHRAE Standard 62.2.
- 458 9. Calls upon local and state legislative and regulatory bodies to adopt residential building codes  
459 with preferences for installing electric appliances and to require electric appliances for building  
460 projects receiving municipal or state funding. Funding for retrofits or building upgrades should  
461 include stipulations that minimize displacement.

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- 462 10. Calls upon ENERGY STAR to provide ratings for electric and electric induction cooking stoves.  
463 11. Calls upon health care practitioners (including physicians, nurses, public health nurses,  
464 community health workers, and many others) to inform patients of the risks of gas stove  
465 emissions and the measures they can take to mitigate exposure, similar to the approach to home  
466 exposures to tobacco. This workforce will be best prepared to address risks such as gas stoves if  
467 health professions increase the amount of environmental health content in curricula.  
468 12. Calls upon CDC’s National Asthma Control Program to add gas stove emission education, source  
469 control, and ventilation strategies to its EXHALE program.  
470 13. Calls upon researchers and funders to broaden the scope of health impacts and populations  
471 studied in relation to gas stove pollution and assess the risks to households cooking with gas.  
472 Other research priorities include identifying the most effective intervention options and  
473 monetizing the health costs and benefits of interventions.  
474

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