

Response provided to journalist  
19 June 2018

**Question**

I just have some questions in relation to the work ToxConsult has done for Defence on the toxicological profiles of PFOS and PFOA.

You may be aware there was recently a US\$850 million settlement between Minnesota Attorney General Lori Swanson and 3M company over PFAS contamination in that state.

Thousands of internal 3M documents were produced during document discovery. The State of Minnesota alleged these showed the company suppressed academic research on the hazards of PFAS chemicals (including making secret payments to academics) funded friendly research to help act as a defensive barrier to litigation and undermined its own studies which indicated health effects. These documents also highlighted a number of methodological issues with the company's studies on its workers.

- A) Does Defence feel ToxConsult has adequately addressed potential conflict of interest issues in using industry-funded research in its reports?
- B) I notice that Ellen Chang of Exponent's review - concluding that the chemicals do not cause cancer - was one of the only studies referenced when discussing cancer epidemiology in ToxConsult's toxicological profiles (included in the HHRA). Given Ms Chang was a star witness for 3M in this court case, and has been working for 3M for an extended period of time, was that appropriate?

**Response**

At the commencement of the Williamstown environmental investigation into PFAS there was no published guidance on the toxicological assessment of PFAS. Defence required expert toxicology advice to conduct a comprehensive Human Health Risk Assessment (HHRA). The HHRA was undertaken by a specialist environmental consultant, AECOM, and was conducted under the guidance of Food Standards Australia New Zealand's (FSANZ) values and a certified expert toxicologist, ToxConsult.

ToxConsult developed guidance values for perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) perfluorohexane sulfonate (PFHxS) and Perfluorohexanoic Acid (PFHxA). These guidance values were used in early Defence PFAS investigations as there were no national guidance values. Defence transitioned to nationally agreed guidance values as soon as they were introduced and now uses guidance values for PFOS, PFOA and PFHxS that were developed by FSANZ.

Further questions regarding ToxConsult practices should be directed to ToxConsult.