ACC POSITION ON ADOPTION OF DHS RECOMMENDATION FOR PFOA/PFOS
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USEPA Health Advisories — PFOA & PFOS

• Health Advisories (HA) are based on developmental effects in rodent pups
  • PFOA – delayed ossification, accelerated puberty
  • PFOS – delayed eye opening (1st gen), transient decrease in pup body weight (2nd gen)

• USEPA based HA on estimate of pre-natal exposure
• DHS recommendations are based on pre- and post-natal exposures
DHS Approach Overstates the Equivalent Dose

1Source: Kieskamp et al. 2018
DHS Model Overestimates Exposure in Breast-fed Infants

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Fromme et al. 2010
Mogensen et al. 2015
DHS Recommendations Significantly Overestimate Risk

- DHS evaluation considers pre- and post-natal exposure
  - Developmental endpoints result from pre-natal exposure only
  - DHS recommendations are based on highest serum levels predicted by the model
    - Serum levels predicted from pre-natal exposure alone are much lower (~2.5 mg/L)
- Model used by DHS over predicts serum levels resulting from post-natal exposure
  - Predicted level is 2-3 times higher than empirical data