

Public Consultation: Australian Drinking Water Guidelines: per- and poly-fluoroalkylated substances draft chemical fact sheet and health based guideline values

Submission from Cancer Council Australia

October 2017

Cancer Council Australia is the nation's peak non-government cancer control organisation. Cancer Council's Occupational and Environmental Cancer Committee includes members with national standing in relevant disciplines including epidemiology, molecular biology, occupational health, clinical oncology and public health. Comments from the Committee form the basis of this submission and their contribution is acknowledged. Cancer Council Australia welcomes the opportunity to provide comment on per- and poly-fluoroalkylated substances draft chemical fact sheet.

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Overview

Questions related to the consultation paper.

1. Is the information provided relevant and clear?

In our view more information on the potential health hazards could be provided in the fact sheet. Australian research on these compounds, as well as information from the International Agency for Research on Cancer (IARC), could be provided to better inform the community. IARC has classified perfluorooctanoic acid (PFOA) as possibly carcinogenic to humans.¹ The IARC monograph outlines "limited evidence" in humans for the carcinogenicity of PFOA, and identifies a positive association between exposure to PFOA and cancers of the testis and kidney.

3. Do you have any general comments on the draft fact sheet?

The draft fact sheet primarily focuses on calculating a proposed regulatory limit in water for these compounds. In our view it would be useful to describe the potential health hazards these regulatory limits are anticipated to minimise. It should be clear in the factsheet that possible cancer causation is the primary consideration.

¹ International Agency for Research on Cancer. Volume 110: Perfluoro-octanoic acid, tetrafluoroethylene, dichloromethane, 1,2-dichloropropane, 1,3-propane sultone. IARC Working Group; Lyon.