2025.3.9 高木基金PFASプロジェクト市民フォーラム コメント

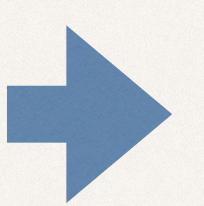
## なぜ食品安全委員会は 論文を入れたり出したりできるのか?

ーー「PFAS評価書」検証が洗い出した日本のシステム――



## 政策遂行のための成果物 (この場合評価書) の条件

科学的な裏づけが必要

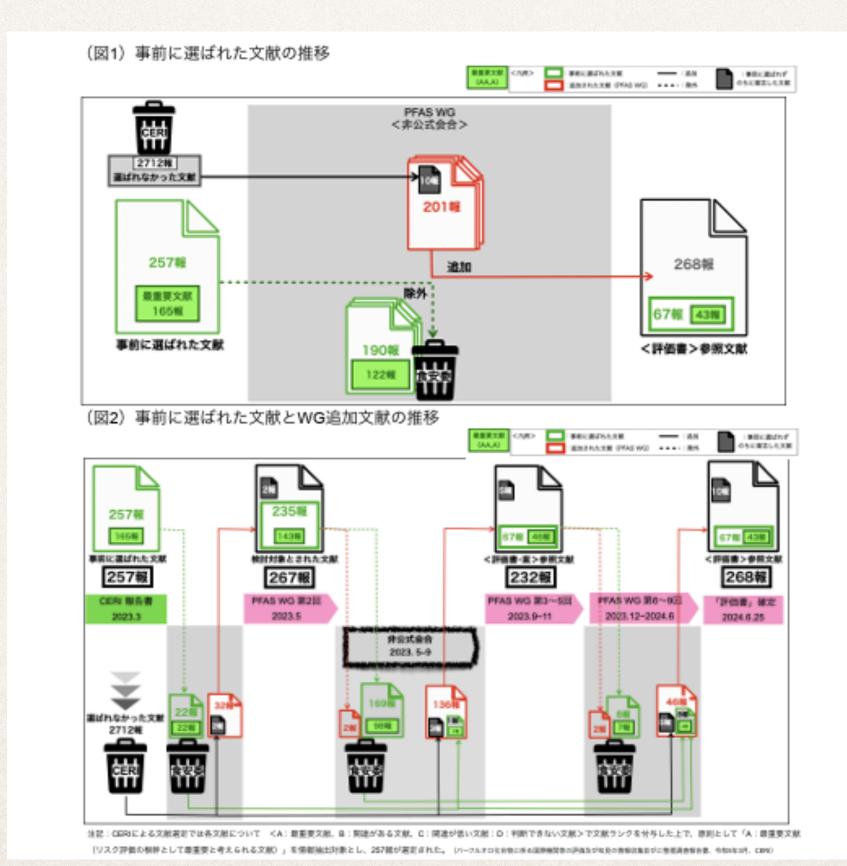


・独立した専門家の評価や審査 (「ピアレビュー」)による最新の 知見に基づいた科学的根拠

●最終結果までの過程が妥当であるかどうかを検証できる透明性 (再現性:第三者がトレースできる情報の提供)

## 食品安全委員会の評価書

### 論文の出し入れ フリーダム



高木PFASプロジェクト 検証レポート

これを許している日本のシステムとは?

- 1)「ピアレビュー」の欠如した決定過程
- 2) 決定過程を記録しなくてもよいシステム

## 1) ピアレビューシステムの欠如した決定過程

### 一方米国では

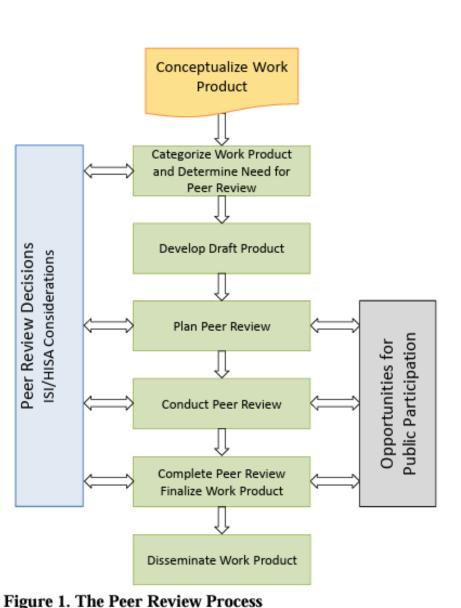
### EPA

(環境保護庁)



Science and Technology Policy Council

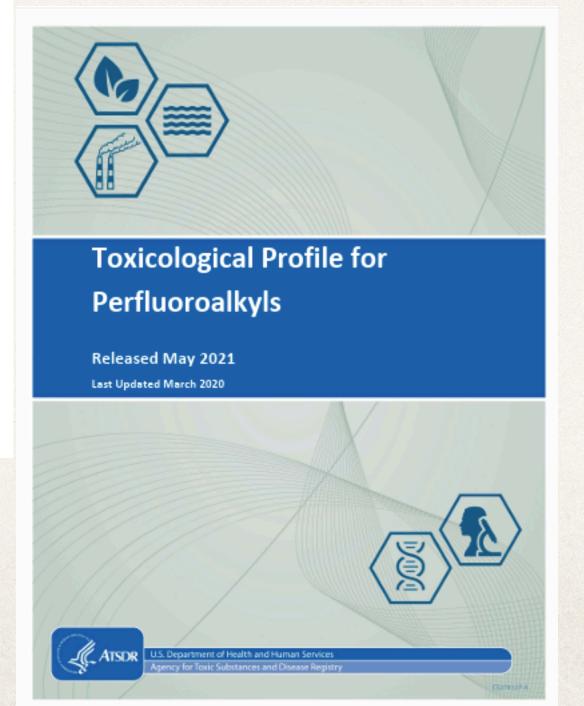
# HANDBOOK



4<sup>th</sup> Edition

### ATSDR

(毒性物質疾病登録庁)



PERFLUOROALKYLS

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## 2) 決定過程を記録しなくてもよいシステム

一方米国では

ATSDRの一例

レビュワーのコメント とATSDRの対応の記録 =行政文書

PERFLUOROALKYLS

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These experts collectively have knowledge of toxicology, chemistry, and/or health effects. All reviewers were selected in conformity with Section 104(I)(13) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended.

ATSDR scientists review peer reviewers' comments and determine whether changes will be made to the profile based on comments. The peer reviewers' comments and responses to these comments are part of the administrative record for this compound.

The listing of peer reviewers should not be understood to imply their approval of the profile's final content. The responsibility for the content of this profile lies with ATSDR.

DISPOSITION OF PEER REVIEW COMMENTS FOR TOXICOLOGICAL PROFILE FOR PERFLUOROALKYLS

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Agency for Toxic Substances and Disease Registry

June 2018

COMMENT: A policy decision is necessary with respect to a number of opinions that have been cited from the "C8 Science Panel" with respect to whether certain health effects in humans are "probable" from PFOA. Opinions of this type appear on pages 128 line 16, page 140 line 31, page 166 line 21, page 178 line 4, page 205 line 16, page 232 line 31, page 265 line 1, page 267 line 11, page 268 line 29, page 405 line 30, and page 421. These opinions were developed for the purpose of introduction into legal proceedings in a specific civil suit. In at least some cases these "expert opinions" are not independent of the investigators who performed the studies that are the basis for those opinions. They do not appear to have been produced in the same manner and lack the authority of evaluations by US Governmental or International Scientific Agencies such as EPA, NTP, or IARC which are appropriately cited in the document. If C8 Science Panel opinions are to be included, ATSDR should at the least ensure that other expert opinions introduced into these or similar legal proceedings are also included. My preference would be to have the toxicologic profile remain a scientific document, consistent with the stated aims, and to exclude the "C8 Science Panel" opinions and all other expert opinions constructed for the specific purpose of civil litigation.

**RESPONSE:** Based on comments from several peer reviewers, ATSDR removed the C8 Science Panel conclusions from the profile. Note that the results of the C8 Health Study and C8 Health Panel studies are still discussed in the profile. The following statements were deleted:

Section 2.5 (PFOA—Epidemiology Studies—Heart Disease)

The C8 Science Panel (2011) concluded that there was no probable link between PFOA and coronary heart disease (including its manifestations as myocardial infarction, angina, and coronary bypass surgery) or stroke among members in this community.

Section 2.5 (PFOA—Epidemiology Studies—Hypertension)

The C8 Science Panel (2011) concluded that there were adequate data to suggest a probable link between PFOA exposure and pregnancy-induced hypertension; it is noted that the panel considered the Savitz et al. (2012a, 2012b) studies in their analysis. The Panel also concluded that there is not a probable link between PFOA exposure and diagnosed high blood pressure (hypertension).

Section 2.8 (PFOA—Epidemiology Studies)

Based on the studies available at the time, the C8 Science Panel (2011) concluded that there is not a probable link between exposure to PFOA and osteoarthritis.

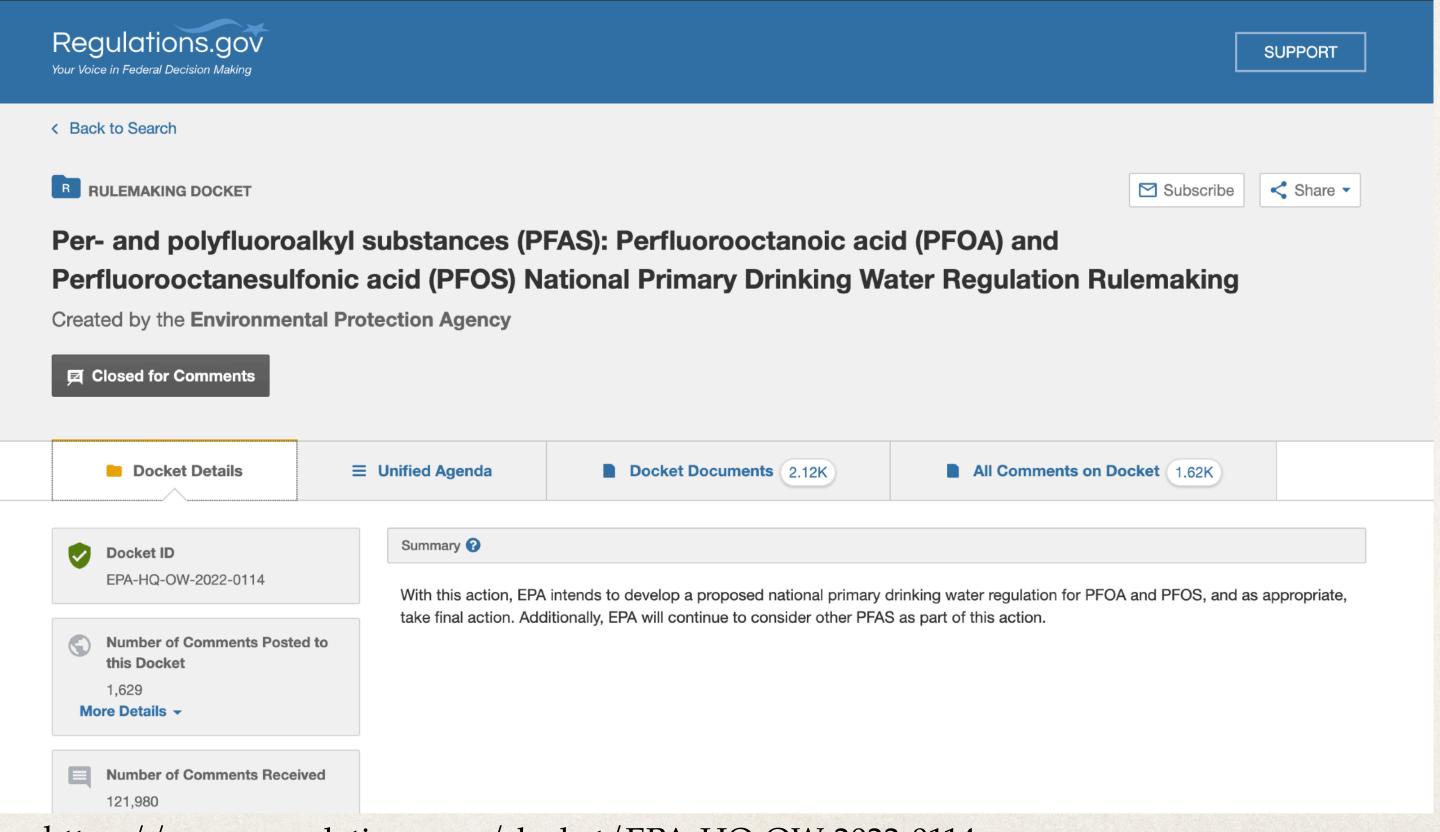
Section 2.9 (PFOA—Epidemiology Studies—Liver Disease)

The C8 Science Panel (2011) concluded that there was not a probable link between PFOA exposure and liver disease.

## 2) 決定過程を記録しなくてもよいシステム

### 一方米国では

### 法制化までの文書リスト 整理して公開



https://www.regulations.gov/docket/EPA-HQ-OW-2022-0114

## ということで、パブコメを書きましょう

手続きに疑義を持たれる 食品安全委員会の評価書を もとにした50ng/Lは受け入れ られない。



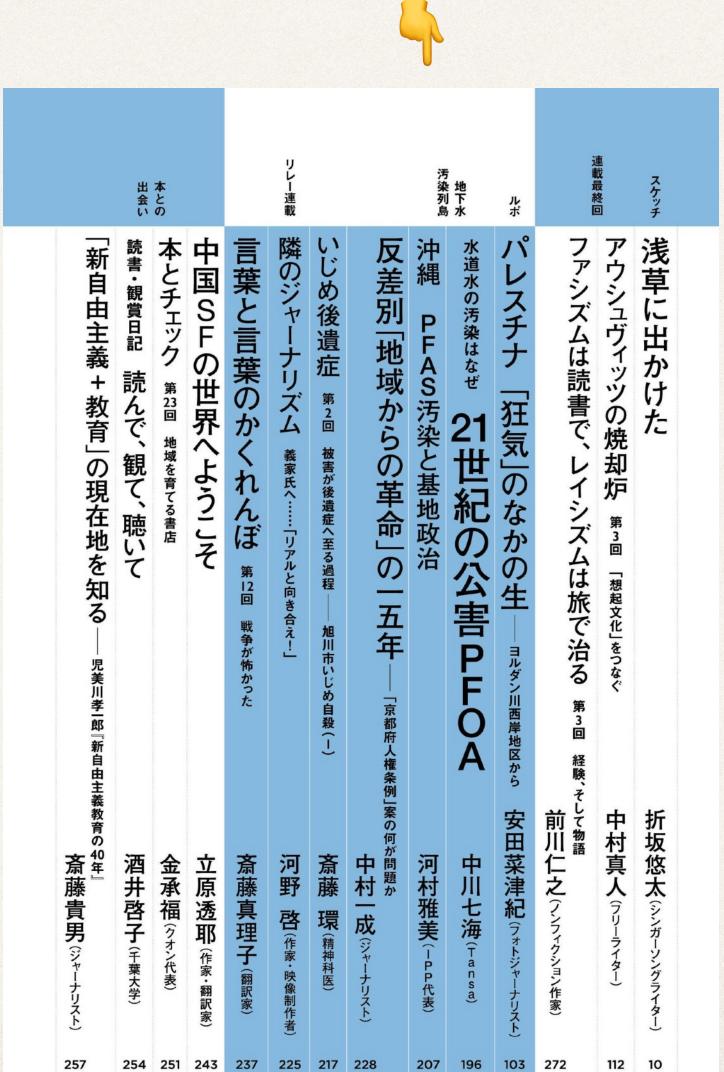
IPPサイトに呼びかけ 記事公開予定



### そして日本のシステムをまともなものに

「PFAS評価書」検証を活かそう

### 普段の活動は 『世界』最新刊4月号の論考で





古波藏 契×福永玄弥 後」解体

仪依存社会