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**The Conundrum of the PFOA Human Half-life,
An International Collaboration**

By

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39 RP and LR are employees of Gradient, a consulting firm serving a variety of clients in the private
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Abstract

60 The Steering Committee of the Alliance for Risk Assessment (ARA) opened a call for scientists
61 interested in resolving what appeared to be a conundrum in estimating of the half-life of
62 perfluorooctanoate (PFOA) in humans. An Advisory Committee was formed from nominations
63 received and a subsequent invitation led to the development of three small independent working
64 groups to review appropriate information and attempt a resolution. Initial findings were shared
65 among these groups and a conclusion developed from the ensuing discussions.

66
67 Many human observational studies have estimated the PFOA half-life. Most of these studies note
68 the likely occurrence of unmonitored PFOA exposures, which could *inflate* values of the
69 estimated PFOA half-life. Also, few of these studies estimated the half-life of PFOA isomers, the
70 branched chains of which likely have shorter half-lives. This could *deflate* values of the
71 estimated linear PFOA half-life. Fortunately, several studies informed both of these potential
72 problems. The majority opinion of this international collaboration is that the studies striking the
73 best balance in addressing some of these uncertainties indicate the likely central tendency of the
74 human PFOA half-life is less than 2 years. The single best value appears to be the geometric
75 mean (GM) of 1.3 years (Zhang et al., 2013; Table 3), based on a GM = 1.7 years in young
76 females (n = 20) and GM = 1.2 years in males of all ages and older females (n = 66). However, a
77 combined median value from Zhang et al. (2013) of 1.8 years also adds value to this range of
78 central tendency. While the Collaboration found this study to be the least encumbered with
79 unmonitored PFOA exposures and branched isomers, more studies of similar design would be
80 valuable. Also valuable would be clarification around background exposures in other existing
81 studies in case adjustments to half-life estimates are attempted.

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Introduction

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86
87 Estimated safe doses for PFOA vary by several hundred-fold among government organizations
88 (Dourson et al., 2019; Mikkonen et al., 2020; Drinking Water Inspectorate, 2021). This wide
89 range is due to differences in both the judgment of PFOA's critical effect and its elimination in
90 experimental animal versus humans or among humans. In particular, elimination half-life
91 estimates of PFOA in humans have been made in numerous observational studies and are found
92 to vary from a low of 1.2 years to a high of 14.9 years (Dourson and Gadagbui, 2021). This
93 elimination, when compared with daily excretion in experimental animals or the amount of
94 PFOA in the animal's body over time [measured as the Area-Under-the-Curve (AUC)], leads to
95 adjustments to the experimental animal No Observed Adverse Effect Level (NOAEL) or
96 Benchmark Dose (BMD) point of departure to determine difference safe doses.

97
98 Most authors of human observational studies in which half-life estimates are rendered have
99 stated that unmonitored PFOA exposures might exist in their studies, and that the corresponding
100 estimates of half-life may therefore be inflated. Russell et al. (2015) and Bartell (2012) give
101 theoretical underpinnings for this inflation and show how accounting properly for unmonitored
102 exposures results in smaller half-life estimates. For example, Bartell (2012) estimated that
103 unmonitored background exposures that contribute 20% of the total exposure will greatly reduce
104 estimated half-life if more than two half-lives pass between the sampling time points. Bartell
105 (2012) provided a figure that can be used to adjust half-life estimates based on other estimated
106 background exposures and time between sampling points. A clinical study by Elcombe et al.
107 (2013)¹ that tested PFOA as a chemotherapeutic agent has also been used to determine a PFOA
108 half-life of 0.5 year in a small subset (n=3) of the whole exposed patient cohort (n=42) (Dourson
109 and Gadagbui, 2021). While helpful because of the clinical nature of this study, this range adds
110 to the disparity in estimated half-life values.

111
112 This disparity was recognized by the Steering Committee of the Alliance for Risk
113 Assessment (ARA)² as a problem that might be resolvable via collaboration of interested
114 scientists, similar to other, seemingly intractable, problems that cross multiple jurisdictions. An
115 example of the latter includes the development of a workshop series to showcase research case
116 studies in response to the 2009 National Academy of Sciences publication entitled Science and
117 Decisions (see: https://tera.org/Alliance%20for%20Risk/ARA_Dose-Response.htm). ARA
118 endorsed an international collaboration to meet and develop this brief communication which
119 explores reasons for the large range in values of the human PFOA half-life, and ways to
120 reconcile these differences, if possible.

121

¹ Elcombe et al. (2013) administered PFOA to 42 adult humans, both male and female, in a phase 1, range-finding, clinical trial for cancer chemotherapy. Doses were given once weekly as an oral tablet from 50 to 1200 mg for up to 6 weeks. Blood concentrations of PFOA over 6 weeks were closely monitored. After the 6-week period, nine patients continued the therapy. Adequate kidney and liver function and physical integrity of the gastrointestinal tract were important criteria for acceptance of patients into the trial. No overt toxicity was observed. The daily mg/kg-day doses were estimated by Dourson et al. (2019) as 0.1 to 2.3 mg/kg-day and approximated exposures in the experimental animal studies that caused toxicity.

² See: https://tera.org/Alliance%20for%20Risk/ARA_Steering_Committee.htm

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Methods

The Steering Committee of the Alliance for Risk Assessment (ARA) solicited nominations from interested scientists and managers in the early spring of 2021 to form an advisory committee that would shepherd the project entitled “The Conundrum of the PFOA Half-life” through to a potential resolution.³ After reviewing nominations, the following scientists were selected by the Steering Committee as members of the Advisory Committee:

- Harvey Clewell, Ramboll
- Tony Cox, Cox Associates
- Michael Dourson, Toxicology Excellence for Risk Assessment
- Shannon Ethridge, International Association of Plumbing and Mechanical Officials
- Ali Hamade, Oregon Health Authority
- Ravi Naidu, CRC CARE
- Nitin Verma, Chitkara University

The Advisory Committee next assembled a list of relevant publications on PFOA human half-life and opened a call for interested scientists in the late spring of 2021 to participate in an international collaboration to investigate this issue. After nominations from scientists interested in this collaboration were reviewed, the following scientists were selected and arranged into three independent groups, assuring that various sectors were represented in each group:

- Jerry Campbell, Ramboll
- Harvey Clewell, Ramboll
- Norman Forsberg, Arcadis U.S., Inc.
- Bernard Gadagbui, Toxicology Excellence for Risk Assessment
- Ali Hamade, Oregon Health Authority
- Ravi Naidu, CRC CARE
- Nathan Pechacek, Ecolab
- Tiago Severo Peixe, State University of Londrina, Parana, Brazil
- Robyn Prueitt, Gradient
- Andrew Prussia, Agency for Toxic Substances and Disease Registry
- Mahesh Rachamalla, University of Saskatchewan
- Lorenz Rhomberg, Gradient
- James Smith, Navy and Marine Corps Public Health Center
- Nitin Verma, Chitkara University

The charge to the Small Groups was determined by the Advisory Committee to be as follows:

- Select studies from the list of studies found at <https://tera.org/Alliance%20for%20Risk/Projects/pfoahumanhalflife.html> for further review

³ See: <https://tera.org/Alliance%20for%20Risk/Projects/pfoahumanhalflife.html>
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- 163 and explain why certain studies were excluded. The small groups were free to add studies
164 as appropriate and explain why they were added.
- 165 • Develop a Small Group consensus on PFOA half-life, discussing critical issues, such as,
166 volume of distribution, half-lives in different populations, and how uncertainty factors for
167 experimental animal to human extrapolation and within human variability are
168 affected. Small Groups were free to add critical issues as appropriate.
 - 169 • No inter-group discussions are allowed as to avoid premature closure.
 - 170 • The deadline was August 31st, 2021 for this first round of review.
 - 171 • First intergroup international discussion was held on September 7/8, 2021.
 - 172 • A second round of reviews occurred through an interactive web-based discussion during
173 October and early November of 2021.
 - 174 • A position was developed and shared with the international community in December 2021 and
175 is shown in the following results.

176 177 **Results** 178

179 Table 1 summarizes studies and or analyses of studies that were considered by the Small Groups
180 to be of some use. Initial findings for two of three Small Groups did not consider any one study
181 as sufficient for determining the PFOA half-life but selected a subset of better studies. The third
182 Small Group considered Xu et al. (2020) to be more credible due to the reduced likelihood of
183 unmonitored PFOA exposures. Initial findings were summarized in brief reports that are
184 available at <https://tera.org/Alliance%20for%20Risk/Projects/pfoahumanhalflife.html>.

185
186 During the course of the Collaboration most studies were judged to include unmonitored PFOA
187 exposures, with the exception perhaps of the clinical study by Elcombe et al. (2013), where doses
188 were sufficiently high so as to preclude conflation with unmonitored exposures. For studies with
189 lower serum PFOA levels, up to ~25% bias in the half-life was considered possible due to these
190 unmonitored PFOA exposures based on the work of DeSilva et al. (2020) who stated that
191 drinking water “has been estimated to contribute *up to* 75% of exposures near contaminated
192 sites.” The Collaboration thought an argument could be made for a 20% reduction in the average
193 half-life in studies that otherwise mentioned or alluded to unmonitored PFOA exposures, but also
194 recognized that this adjustment would be study-dependent. Further to this point, Russell et al.
195 (2015) and Bartell (2012) found that estimates of PFOA half-lives that include unmonitored
196 PFOA exposures are inflated, although the magnitude is difficult to determine without additional
197 evaluation of individual studies. For example, Bartell (2012) found the three studies they
198 evaluated to include a bias ranging from 2.7% to 26% when compared with background
199 exposures, although not all exposures may have been monitored. However, the study by Zhang et
200 al. (2013) was found by the Collaboration to be insignificantly encumbered by unmonitored
201 PFOA exposures, since its estimated half-lives were based on estimates of renal clearance from
202 men and women of the general Chinese population (aged 20 years to 88 years) with no known
203 point source of exposure to PFOA.

204
205 An issue also arose on whether reported PFOA half-lives were specific to the straight chain
206 isomer of PFOA, represented measurement and summation of mixtures of several PFOA

207 isomers, or accounted for exposure to PFOA precursors. Benskin et al. (2009) and De Silva et al.
208 (2009) reported faster elimination rates and shorter half-lives for branched isomers of PFOA
209 compared to linear PFOA in rats gavaged with an electrochemically fluorinated PFOA standard.
210 Beesoon et al. (2015) provided a mechanistic explanation for the faster elimination rate of
211 branched isomers of PFOA that was related to dissociation constants (K_d) of linear and branched
212 PFOA isomers with human serum albumin. Beesoon et al. (2015) showed that K_d s were three to
213 four-fold higher for individual branched isomers compared to linear PFOA and that branched
214 isomers were less protein bound than linear PFOA in experiments that evaluated a technical
215 mixture of PFOA. However, the analytical methods employed to analyze PFOA in blood have
216 not used consistent quantification procedures and few studies reporting serum elimination rates
217 in human populations have distinguished between PFOA isomers in their analytical methods
218 (Bartell et al. 2010, Gomis et al. 2016, Li et al. 2018). An exception to this is the study by Zhang
219 et al. (2013) that analyzed and determined elimination rates for branched and linear PFOA
220 isomers. Since branched PFOA isomers were seen to be eliminated more quickly (see Zhang et
221 al., 2013, Table 3), this would lower the overall PFOA half-life in situations where PFOA
222 included a substantial percentage of branched isomers.⁴ Exposure to PFOA precursors might also
223 artificially inflate half-life estimates for PFOA. The Collaboration considered this to be a critical
224 issue for human health risk assessment, where risk-based criteria and/or standards for PFOA are
225 often calculated using a single human PFOA half-life estimate (for which the profile of PFOA
226 isomers is not commonly reported), but applied to samples quantified using analytical methods
227 that sum isomers to report a single PFOA value⁵.

228
229 The Collaboration discovered after a more careful reading of studies in Table 1 that this mixture
230 issue was poorly addressed in almost all studies, with the exception of Zhang et al. (2013). In
231 particular, Zhang et al. (2013) monitored branched isomers of PFOA and estimated their half-
232 lives. This study showed little variation between the estimated half-life of the linear isomer and
233 that of the sum of all PFOA isomers including the linear isomer due principally to the small
234 proportion of branched isomers in the mixture. Specifically, a geometric mean PFOA half-life of
235 1.3 years was evident for both along with a median PFOA half-life of approximately 1.8 years
236 for both. However, the geometric mean and median half-lives of the 4*m*- and 5*m*-PFOA branched

⁴ From EPA Method 533: “A quantitative standard for PFOA is currently available only for the linear isomer; however, a technical grade standard (Sect. 3.22) is available for PFOA that contains the linear and branched isomers (Wellington Labs, Cat. No. T-PFOA, or equivalent). This product or a similar technical-grade PFOA standard must be used to identify the retention times of the branched and linear PFOA isomers. However, the linear-only PFOA standard must be used for quantitation until a quantitative PFOA standard containing the branched and linear isomers becomes commercially available.”

⁵ From the U.S. Department of Defense and Department of Energy’s (2019) Quality Systems Manual (QSM) for Environmental Laboratories: “Standards containing both branched and linear isomers must be used when commercially available. PFAS method analytes may consist of both branched and linear isomers, but quantitative standards that contain the linear and branched isomers do not exist for all method analytes. For PFAS that do not have a quantitative branched and linear standard, identify the branched isomers by analyzing a qualitative standard that includes both linear and branched isomers and determine retention times, transitions and transition ion ratios. **Quantitate samples by integrating the total response (i.e., accounting for peaks that are identified as linear and branched isomers) and relying on the initial calibration that uses the linear isomer quantitative standard** [emphasis added].”

237 isomers were commonly 40 to 70% lower than the linear isomer (Zhang et al. 2013).
238 Uncertainties due to lack of isomer characterization were present in the estimated PFOA half-
239 lives in many of the other studies. Similarly designed studies as Zhang et al. (2013) could shed
240 more light on the range of half-lives for PFOA isomers, both straight and branched. The
241 Collaboration did not uncover any additional hypotheses beyond those reported by Beesoon et al.
242 (2015) that would account for the quicker half-lives of branched isomers when compared with
243 the straight chain. However, it was recognized that this information would be of great use in
244 human health risk assessment given the reports of differential biological and environmental
245 transport and fate properties between linear and branched PFOA (Benskin et al. 2009; De Silva
246 et al. 2009; Schulz et al. 2020).

247
248 Studies from Table 1 considered by the Collaboration to have the least amount of uncertainty
249 with unmonitored PFOA exposures and isomer accountability are shown in Table 2. The first
250 study by Elcombe et al. (2013) was used by Dourson and Gadagbui (2021) to estimate a half-life
251 of 0.5 years based on 3 individuals who were monitored extensively over 6 weeks in this clinical
252 trial of PFOA given as a chemotherapeutic drug. This study had the advantage of a dose high
253 enough to avoid problems with unmonitored PFOA exposures and avoided branched-chain
254 PFOA isomers since the administered PFOA was straight chain. The half-life in this study was
255 also determined from PFOA serum concentrations that were at or lower than the estimated
256 human renal resorption limit of K_m of 4 $\mu\text{g/ml}$. Saturation of resorption is only likely to occur at
257 plasma concentrations above 10 $\mu\text{Moles/L}$, based on an estimated renal transporter K_m of 4
258 $\mu\text{g/ml}$ from an analysis of Elcombe et al. (2013) by Campbell et al. (2016). The Elcombe et al.
259 (2013) study had the disadvantages that only a very small number of individuals ($n=3$) had a
260 dose that was not expected to saturate renal resorption. An estimate of PFOA half-life including
261 all 42 patients might shed more light from this unique study. A potential additional problem with
262 using this study for estimating a PFOA half-life is its relatively short duration of 6 weeks.⁶

263
264 The second study by Xu et al. (2020) showed a half-life geometric mean of ~1.5 years based on a
265 human observational study of 17 individuals monitored frequently over 5 months from a likely
266 single source of PFOA exposure. This study had the advantage of minimal additional sources of
267 PFOA exposure, some measurement of PFOA branch isomers, and an estimate of background
268 exposures from which a lower, and more appropriate half-life could be determined. This study
269 had the disadvantage of a small number of individuals and a rather short follow up time, but
270 certainly both were better than that found in Elcombe et al. (2013). Also, although this study
271 measured branched PFOA isomers, they were not clearly distinguished in the estimated PFOA
272 half-life.

273
274 The third study by Zhang et al. (2013) determined the PFOA half-life from estimates of renal
275 clearance from 86 men and women of the general Chinese population (aged 20 to 88 years) with
276 no known point source of exposure to PFOA. Specifically, the half-life geometric mean was
277 estimated at 1.7 years in young females ($n = 20$) and 1.2 years in males of all ages and older

⁶ Some might posit that the individuals in this study were sick so that the elimination measured in these individuals may not relate to the general population, but clinical measures in study individuals demonstrated normal liver and kidney function (personal communication between Geary Olsen and James Smith, 2021).

278 females (n = 66). The combined geometric mean was 1.3 years. Median values of half-life were
279 2.0 years in young females and 1.8 years in males of all ages and older females, or 1.8 years
280 when combined. Arithmetic mean values were not reliable since the clearance values formed a
281 skewed right distribution. This study had the advantage of a half-life unencumbered by the
282 problem of unmonitored PFOA exposures, since clearance from the blood integrates all sources
283 of exposure. Also, PFOA isomers were individually quantified and separate estimates of isomer
284 half-lives were given. This study had the disadvantage that not all sources of elimination from
285 the body were accounted for, leading the authors to suggest that the half-lives determined were
286 likely upper limits.

287
288 After extensive email discussions,⁷ the Collaboration then considered three options. Each
289 scientist was asked to consider choosing a preferred option along with reasons for the
290 choice. Scientists were also encouraged to indicate an option that could be lived with, but of
291 course not preferred, and, if appropriate, to select an option that could *not* be lived with. The
292 development of other options was also solicited. Options considered were:

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294
- 295 • Select a single study to represent your best judgment of the PFOA half-life.
 - 296 • Select a range of the PFOA half-life from a small group of studies with or without a single
297 value, such as those found in Table 2.
 - 298 • Select a range of the PFOA half-life from a larger group of studies with or without a single
299 value, such as those found in Table 1.

300 Scientists' choices were sent to two members of the Advisory Committee in a confidential
301 manner and responses were collated as shown in Table 3. Option 1 was preferred by the majority
302 of scientists although several of those voting for option 1 could also live with option 2. A smaller
303 number of scientists preferred option 2, with several of them also able to live with option 1.
304 Option 3 was preferred by two scientists, with one able to live with this choice, judging that the
305 choice of only one study (as in option 1), or even of a few studies (as in option 2), was not
306 sufficiently supportable at this point in the investigation.

307
308 During the course of this Collaboration three additional items were discussed. First, the question
309 of the appropriate averaging value for the PFOA half-life arose. Several studies give the half-life
310 as the geometric mean, the arithmetic mean, or the median value. Zhang et al. (2013) showed
311 that arithmetic mean half-lives based on arithmetic mean clearances did not match arithmetic
312 mean half-lives based on individual clearances. In contrast, the estimation of geometric mean
313 half-lives from either geometric mean clearance or individual geometric mean clearance did not
314 differ to the same degree. This is because the distribution of individual clearances and
315 corresponding half-lives were found to be skewed right (Zhang et al., 2013; ARA, 2021). Based
316 on this finding, the Collaboration considered the geometric mean to be superior to the arithmetic
317 mean, and that the medians can add value to this range of central tendency.

318

⁷ A summary of these email discussions can be found at:

https://tera.org/Alliance%20for%20Risk/Projects/PFOA%20Groups/ARA_2021_Questions_%20Discussion_on_SG_Summaries_Fall%20of_2021.pdf

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319 Second, the estimation of the volume of distribution was discussed. In some studies, the volume
320 of distribution was based on measured PFOA exposures in humans, but such estimations would
321 be inappropriately low if unmonitored sources of exposure are occurring. Other studies or
322 analyses estimated the volume of distribution from a small population of humans in a clinical
323 trial where PFOA was used as a cancer chemotherapeutic drug and in subjects in whom the
324 kinetics of PFOA may or may not represent that expected in the general population (Elcombe et
325 al., 2013). Other investigators selected a volume of distribution from either a small group of
326 monkeys (n = 3) by Butenhoff et al. (2004) or from other experimental animals. Selecting one
327 value for the volume of distribution from this assortment of values is challenging given these
328 different approaches. However, a value of around 0.18 Liters/kg body weight was considered by
329 the Collaboration to approximate the likely value in humans.

330
331 Finally, some studies showed indications of the potential range for inter-individual variability in
332 PFOA clearance. In particular, instances of blood loss and replacement appeared to lead to faster
333 elimination, as the lost blood removes part of the PFOA body burden and is replaced by blood
334 without added burden. This includes menstrual blood loss and episodes of blood donation.
335 Pregnancy and breastfeeding may also diminish body burden, although that burden is transferred
336 to the fetus and infant, respectively. Observations of somewhat faster elimination among
337 reproductive-age women in some studies appeared to be explicable by menstrual and childbirth
338 loss. The possible role of nutritional differences among people, perhaps through an effect on
339 fatty acid uptake, was also suggested in some studies but has not been clearly characterized. The
340 Collaboration encourages additional research in this area.

341

342

343

Discussion

344

345 This Collaboration was an attempt to bridge the rather large differences in estimated PFOA half-
346 lives, ranging from 1.2 to 14.9 years, shown by a number of investigators (e.g., Dourson and
347 Gadagbui, 2021). The ARA Steering Committee invited a wide participation in the deliberations
348 and discussions by an active list of over 100 international colleagues from government, industry,
349 academia and consulting, whom received periodic summary emails, and several social media
350 postings to over 4000 individuals. The effort lasted the better part of 6 months and included
351 scientists from various sectors and countries.

352

353 The Collaboration's majority opinion is that the study with the least encumbrances to determine
354 the PFOA half-life is that of Zhang et al. (2013) with a geometric mean value of 1.3 years as in
355 Option 1 of Table 3. Eight members preferred this option and two members could live with it.
356 Four participants preferred Option 2 of Table 3 with a half-life range of central tendency of
357 between 0.5 and 1.5 years and six participants could live with that option. It is possible that the
358 lower part of this range of central tendency might increase with the close monitoring of
359 additional individuals. It is also possible that the upper part of this range might decrease if
360 additional information is provided on possible unmonitored exposures or elimination.
361 Regardless, this range of central tendency not exceeding 2 years is a challenge to the ongoing
362 convention that the half-life is in multiple years. Finally, two scientists opined for Option 3 of

363 Table 3 and one could live with this choice, suggesting that while the fewer studies of Options 1
364 and 2 minimized uncertainties from background exposures and branched isomers, these studies
365 also had limitations in terms of cohort size and or representation of various populations; thus,
366 other studies as in Option 3 are useful for highlighting the inter-individual variability in the half-
367 life estimate among members of the different cohorts.

368
369 Perhaps most important, in the course of this Collaboration, two uncertainties in the conventional
370 thinking that the PFOA half-life is in multiple years became more clear, specifically:

- 371
- 372 • The uncertainty in the amount of unmonitored PFOA exposures, including precursors,
373 expressed by nearly all authors in most studies, and
 - 374 • The uncertainty in PFOA half-life estimates due to the unknown proportion of branched-
375 chain isomers versus straight chain in the measured PFOA exposures.
- 376

377 The first uncertainty will inflate PFOA half-life estimates, the extent of which could be
378 determined by estimating the percent of unmonitored PFOA exposures when compared with total
379 PFOA exposure and using the time between measurements to determine a downward adjustment
380 to the PFOA half-life as per Bartell (2012). That this first uncertainty is likely occurring is
381 evident in recent deliberations by the U.S. Environmental Protection Agency (2021) where the
382 contribution of PFOA from water sources in communities that do not have considerable water
383 contamination could be around 10% overall.⁸

384

385 The second uncertainty deflates PFOA half-life estimates due to the fact that branched isomers
386 of PFOA are eliminated more quickly than PFOA's straight-chain, the extent of which would be
387 determined by estimating the percent of branched PFOA isomers when compared with total
388 PFOA (see Zhang et al., 2013 for an example of this determination). Although these two
389 uncertainties work in opposite directions, the extent of these changes together is not knowable in
390 most of these studies without additional investigation of the PFOA mixture of interest.

391

392 Among the studies reviewed by the Collaboration, the study that is least encumbered by
393 uncertainties from background exposures and PFOA isomers appears to be that of Zhang et al.
394 (2013). The investigators estimated renal clearance values of several PFAS, including PFOA and
395 several of its branched isomers, by using paired urine and serum measurements. The use of
396 paired measurements in this way does not depend on determining sources of PFOA in the
397 environment, since the blood serum concentration integrates all exposures. Thus, uncertainty in
398 potential unmonitored PFOA sources is minimal in this study. However, clearance values in this
399 study depended on determining total PFOA excreted, which the authors acknowledged was not

⁸ Specifically, EPA (2021) cites Hu et al. (2019), East et al. (2021), and Gebbink et al. (2015) providing evidence that drinking water only accounts for about 10 % of the total PFOA exposures at both low- and high-exposure scenarios, with house dust and diet being the primary sources. For example, the results below are from Gebbink et al. (2015):

- Low-exposure scenario: diet (~50%) > air (~25%) > dust (~15%) > **water (~10%)**;
- Intermediate-exposure scenario: diet (~45%) > dust (~35%) > **water (~10%)** ≈ air (~10%);
- High-exposure scenario: dust (~65%) > diet (~20%) > **water (10%)** > air (~5%).

400 done, which led them to suggest that their stated half-life values were upper limits.⁹ Research
401 should continue to determine the proportion of PFOA that is excreted in human urine versus
402 other routes of human elimination, such as feces, hair, sweat, bile, menstruation, and breast-
403 feeding. This might enable a change to the half-life proposed by Zhang et al. (2013).
404

405 The two other studies in Table 2 also avoid these two uncertainties to some extent, although both
406 of them also have some uncertainties. The clinical study by Elcombe et al. (2013) yields a
407 lower half-life of ~0.5 years as determined by Dourson and Gadagbui (2021) based on three,
408 low, single dose patients. However, a similar analysis of 3 healthy individuals from the study of
409 Nilsson et al. (2010) shows a similar half-life, ~0.5 years, after exposure ceased and the
410 background PFOA exposure is subtracted, as shown in Appendix Figure 1.
411

412 The second study in Table 2, Xu et al. (2020), yields a geometric mean half-life of 1.5 years
413 based on 17 individuals with longer follow up time than the Elcombe et al. (2013) study, and
414 likely single dominant source of exposure similar to this latter study. Xu et al. (2020) also
415 subtract background exposures, which ends up lowering their unadjusted half-life significantly,
416 from 1.77 to 1.48 years.
417

418 A good number of studies reviewed by the Collaboration (Table 1) are well-conducted and adjust
419 for background exposures and other sources of bias. They might extend the range of central
420 tendency of half-lives identified in the minimally encumbered studies. However, there remain
421 data that are not presented or are unknown relating to background exposures and branched PFOA
422 isomers. Additional efforts to extend this work might include a meta-analysis of selected studies
423 after a follow up with authors for individual data to determine potentially unmonitored exposures
424 and branched-chain isomers. This area of research may also benefit from additional clearance
425 studies, like Zhang et al. (2013), for confirmation.
426

427

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429

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435 **References**

436

437 Alliance for Risk Assessment (ARA), 2021. Beyond Science and Decisions Workshop XII.

438 Meeting report available at:

<https://tera.org/Alliance%20for%20Risk/Workshop%20XII/Final%20Report.pdf>.

⁹ Vanden Heuvel et al. (1991) reported differences in fecal excretion between female and male rats and that the extent to which humans eliminate PFOA in urine versus feces is not known. If there is significant fecal excretion of PFOA in the human, the intrinsic PFOA half-life would actually be shorter than that estimated on the basis of renal clearance, as in Zhang et al. (2013).

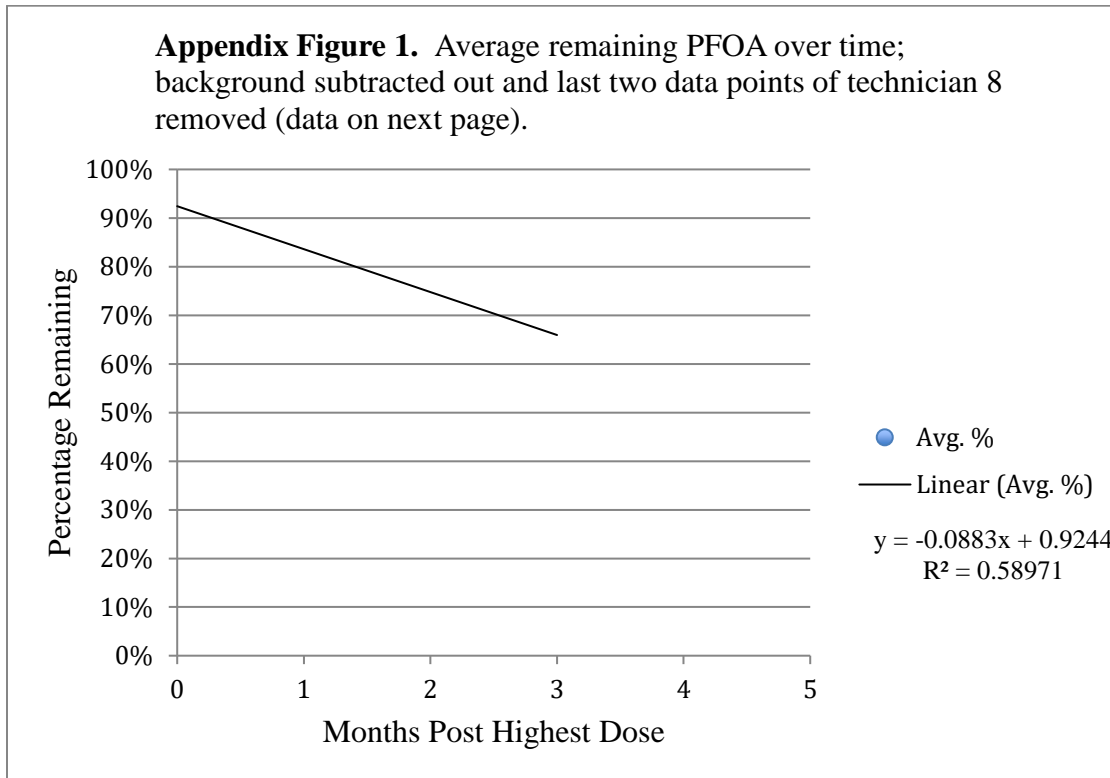
439
440 Bartell, S., 2012. Bias in half-life estimates using log concentration regression in the presence of
441 background exposures, and potential solutions. *J. Expo. Sci. Environ. Epidemiol.* 22, 299 – 303.
442
443 Bartell, S.M., Calafat, A.M., Lyu, C., Kato, K., Ryan, P.B., & Steenland, K., 2010. Rate of
444 decline in serum PFOA concentrations after granular activated carbon filtration at two public
445 water systems in Ohio and West Virginia. *Environ. Health Perspect.* 118(2), 222–228, PMID:
446 20123620. <https://doi.org/10.1289/ehp.0901252>.
447
448 Beesoon, S. and Martin, J.W., 2015. Isomer-specific binding affinity of perfluorooctanesulfonate
449 (PFOS) and perfluorooctanoate (PFOA) to serum proteins. *Environ. Sci. Technol.* 49(9),
450 pp.5722-5731.
451
452 Benskin, J.P., De Silva, A.O., Martin, L.J., Arsenault, G., McCrindle, R., Riddell, N., Mabury,
453 S.A. and Martin, J.W., 2009. Disposition of perfluorinated acid isomers in sprague-dawley rats;
454 Part 1: Single dose. *Environ. Toxicol. Chem.*, 28(3), pp.542-554.
455
456 Butenhoff, J.L., Kennedy Jr, G.L., Hinderliter, P.M., Lieder, P.H., Jung, R., Hansen, K.J.,
457 Gorman, G.S., Noker, P.E., & Thomford, P.J., 2004. Pharmacokinetics of perfluorooctanoate in
458 cynomolgus monkeys. *Toxicol. Sci.* 82(2), 394–406. doi:10.1093/toxsci/kfh302.
459
460 Campbell, J., Allen, B., Olsen, G., Elcombe, C., Doyle, E., Evans, J., & Clewell, H., 2016.
461 Evaluation of the short-term clearance of perfluorooctanoic acid (PFOA) in a clinical trial using
462 a PBPK model and Markov chain Monte Carlo analysis, In: Poster at the Society of Toxicology
463 Annual Meeting.
464
465 De Silva, A.O., Benskin, J.P., Martin, L.J., Arsenault, G., McCrindle, R., Riddell, N., Martin,
466 J.W. and Mabury, S.A., 2009. Disposition of perfluorinated acid isomers in sprague-dawley rats;
467 Part 2: Subchronic dose. *Environ. Toxicol. Chem.*, 28(3), pp.555-567.
468
469 De Silva, A.O., Armitage, J.M., Bruton, T.A., Dassuncao, C., Heiger-Bernays, W., Hu, X.C.,
470 Kärrman, A., Kelly, B., Ng, C., Robuck, A., Sun, M., Webster, T.F., & Sunderland, E.M., 2020.
471 PFAS exposure pathways for humans and wildlife: a synthesis of current knowledge and key
472 gaps in understanding. *Environ. Toxicol. Chem.* <https://doi.org/10.1002/etc.4935>.
473
474 Dourson, M.L., Gadagbui, B., Onyema, C., McGinnis, P.M., & York, R.G., 2019. Data derived
475 extrapolation factors for developmental toxicity: A preliminary research case study with
476 perfluorooctanoate (PFOA). *Regul. Toxicol. Pharmacol.* 108, 104446.
477
478 Dourson, M., & Gadagbui, B., 2021. The dilemma of perfluorooctanoate (PFOA) human half-
479 life. *Regul. Toxicol. Pharmacol.* 126, 105025.
480
481 Drinking Water Inspectorate, 2021. Guidance on the Water Supply (Water Quality)
482 Regulations 20161 specific to PFOS (perfluorooctane sulphonate) and PFOA

483 (perfluorooctanoic acid) concentrations in drinking water. London, UK.
484
485 East, A; Egeghy, PP; Hubal, E; Slover, R; Vallero, DA. 2021. Computational estimates of daily
486 aggregate exposure to PFOA/PFOS from 2011 to 2017 using a basic intake model. *J Expo Sci*
487 *Environ Epidemiol Online* ahead of print.
488
489 Elcombe, C.R., Wolf, C.R., & Westwood, A.L., 2013. US Patent Application Publication.
490 Pub. No.: US 2013/0029928. Available at: <https://patentimages.storage.googleapis.com/24/ee/73/f58267c7d70dde/WO2011101643A1.pdf>.
491
492
493 Gebbink, WA; Berger, U; Cousins, IT. 2015. Estimating human exposure to PFOS isomers and
494 PFCA homologues: the relative importance of direct and indirect (precursor) exposure. *Environ*
495 *Int* 74:160-169.
496
497 Gomis, M.I., Vestergren, R., MacLeod, M., Mueller, J.F., & Cousins, I.T., 2017. Historical
498 human exposure to perfluoroalkyl acids in the United States and Australia reconstructed from
499 biomonitoring data using population-based pharmacokinetic modelling. *Environ. Int.* 108, 92–
500 102. <http://dx.doi.org/10.1016/j.envint.2017.08.002>.
501
502 Gomis, M.I., Vestergren, R., Nilsson, H., & Cousins, I.T., 2016. Contribution of direct and
503 indirect exposure to human serum concentrations of perfluorooctanoic acid in an occupationally
504 exposed group of ski waxers. *Environ. Sci. Technol.* 50(13), 7037-7046.
505
506 Hu, Y; Liu, G; Rood, J; Liang, L; Bray, GA; de Jonge, L; Coull, B; Furtado, JD; Qi, L;
507 Grandjean, P; Sun, Q. (2019). Perfluoroalkyl substances and changes in bone mineral density: A
508 prospective analysis in the POUNDS-LOST study. *Environ Res* 179: 108775.
509
510 Li, Y., Fletcher, T., Mucs, D., Scott, K., Lindh, C.H., Tallving, P., & Jakobsson, K., 2018. Half-
511 lives of PFOS, PFHxS and PFOA after end of exposure to contaminated drinking water. *Occup.*
512 *Environ. Med.* 75(1), 46–51, PMID: 29133598. <https://doi.org/10.1136/oemed-2017-104651>.
513
514 Mikkonen, A.T., Martin, J., Dourson, M.L., Hinwood, A., & Johnson, M.S., 2021. Suggestions
515 for improving the characterisation of risk from exposures to per and polyfluorinated alkyl
516 substances (PFAS). *Environ. Toxicol. Chem.* 40, 883–898. <https://doi.org/10.1002/etc.4931>.
517
518 Nilsson, H., Karrman, A., Westberg, H., Rotander, A., Van Bavel, B., & Lindstrom. G., 2010. A
519 time trend study of significantly elevated perfluorocarboxylate levels in humans after using
520 fluorinated ski wax. *Environ. Sci. Technol.* 44, 2150–2155.
521
522 Olsen, G.W., Burris, J.M., Ehresman, D.J., Froehlich, J.W., Seacat, A.M., Butenhoff, J.L., &
523 Zobel, L.R., 2007. Half-life of serum elimination of perfluorooctanesulfonate,
524 perfluorohexanesulfonate, and perfluorooctanoate in retired fluorochemical production workers.
525 *Environ. Health Perspect.* 115(9), 1298–1305, PMID: 17805419.
526 <https://doi.org/10.1289/ehp.10009>.

527
528 Russell, M.H., Waterland, R.L., & Wong, F., 2015. Calculation of chemical elimination half-life
529 from blood with an ongoing exposure source: the example of perfluorooctanoic acid (PFOA).
530 *Chemosphere*. 129, 210–216, PMID: 25149361.
531 <https://doi.org/10.1016/j.chemosphere.2014.07.061>.
532
533 Schulz, K., Silva, M.R. and Klaper, R., 2020. Distribution and effects of branched versus linear
534 isomers of PFOA, PFOS, and PFHxS: A review of recent literature. *Sci. Total Environ.*, 733,
535 p.139186.
536
537 U.S. Department of Defense and Department of Energy. 2019. Consolidated Quality Systems
538 Manual (QSM) for Environmental Laboratories (Ver. 5.3). Available at:
539 <https://denix.osd.mil/edqw/documents/manuals/qsm-version-5-3-final/>.
540
541 U.S. Environmental Protection Agency. 2021. EXTERNAL PEER REVIEW DRAFT:
542 Proposed Approaches to the Derivation of a Draft Maximum Contaminant Level Goal for
543 Perfluorooctanoic Acid (PFOA) (CASRN 335-67-1) in Drinking Water. EPA Document No.
544 822D21001.
545
546 Vanden Heuvel JP, Kuslikis BI, Van Rafelghem MJ, Peterson RE. 1991. Tissue distribution,
547 metabolism, and elimination of perfluorooctanoic acid in male and female rats. *J Biochem*
548 *Toxicol.* 6(2):83-92. doi: 10.1002/jbt.2570060202. PMID: 1941903.
549
550 Xu, Y., Fletcher, T., Pineda, D., Lindh, C.H., Nilsson, C., Glynn, A., Vogs, C., Norström, K.,
551 Lilja, K., Jakobsson, K., Li, Y., 2020. Serum half-lives for short- and long-chain perfluoroalkyl
552 acids after ceasing exposure from drinking water contaminated by firefighting foam. *Environ.*
553 *Health Perspect.* 28, 7, CID: 077004. <https://doi.org/10.1289/EHP6785>
554
555 Zhang, Y., Beesoon, S., Zhu, L., Martin, J.W., 2013. Biomonitoring of perfluoroalkyl acids in
556 human urine and estimates of biological half-life. *Environ. Sci. Technol.* 47(18), 10619–10627,
557 PMID: 23980546. <https://doi.org/10.1021/es401905e>.
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Appendix



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<u>Without background subtracted out</u>			
half-life =	33	months	unforced data; r2 = 0.27
half-life =	16	months	when intercept is forced to 100%; r2 = 0.16
<u>With background subtracted out</u>			
half-life	5.7	months	, unforced data; r2 = 0.59
half-life =	4.2	months	when intercept is forced to 100%; r2 = 0.47

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570 Data for Appendix Figure 1
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Analysis of Nilsson et al., 2010

Data from supplemental Table S2; note Figure 2d of the paper has information from Technician 8 misplaced.
 Note: Bk = background; De = decrease from high month

Condition	Technician 1				Technician 2			
	Month	PFOA (ng/ml)	%De	% De-Bk	Month	PFOA (ng/ml)	% De	% De-Bk
Pre-exposure	Sep	4.80			Sep	8.54		
Exposure	Dec	6.28			Dec	10.1		
Exposure	Jan	12.4			Jan	14.2		
Exposure	Feb	14.3			Feb	15.0		
Exposure	Mar	16.8			Mar	19.9		
Post-exposure	Apr	-			Apr	21.9		
Post-exposure	May	20.1	<<< high month		May	23.1	<<< high month	
Post-exposure	Jun	16.8	16%	22%	Jun	19.6	15%	24%
Post-exposure	Jul	-			Jul	21.0	9%	14%
Post-exposure	Aug	-			Aug	19.3	16%	26%

Condition	Technician 8				%De from Pre with Bck.		%De from Pre without Bck.	
	Month	PFOA (ng/ml)	%De	% De-Bk	Months after high	Avg. %	Avg. %	
Pre-exposure	Sep	474			0	100%	100%	
Exposure	Dec	528			1	84%	77%	
Exposure	Jan	-			2	92%	65%	
Exposure	Feb	535	<<< high month		3	90%	75%	
Exposure	Mar	-			4	88%	-7%	*
Post-exposure	Apr	501	6%	56%	5	87%	-13%	*
Post-exposure	May	520	3%	25%				
Post-exposure	Jun	471	12%	107%				
Post-exposure	Jul	468	13%	113%				
Post-exposure	Aug	-						

* 2nd set of values at 4 & 5 months not plotted

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Table 1. Selected Studies with PFOA half-life estimates.

Study population	Reported Half-life (years) ^a	Comments	Unmonitored Sources of PFOA Exposure Addressed?	PFOA Half-life Accounted for Isomers?
Dourson and Gadagbui (unpublished) Analysis of Nilsson et al. (2010)	AM = 0.9 (+background) AM = 0.6 (-background)	<ul style="list-style-type: none"> • Based on the finding from 3 ski-waxers presumably exposed to PFOA via inhalation of airborne particles and fumes • Modestly high serum levels but below presumed renal resorption limit ^b • Too few individuals for GM estimation 	No, during off duty assumed background exposures only	No, isomers were combined in analysis
Elcombe et al. (2013)	AM 0.5	<ul style="list-style-type: none"> • Based on a new analysis of data from Elcombe et al. (2013) by Dourson and Gadagbui (2021) for 3 cancer patients • Patients received a single dose of PFOA with 6 weeks of follow up with serum levels likely to be below level of saturation of renal resorption ^b 	Not needed based on high dose given	Not applicable, dosing was with linear isomer

Study population	Reported Half-life (years) ^a	Comments	Unmonitored Sources of PFOA Exposure Addressed?	PFOA Half-life Accounted for Isomers?
Xu et al. (2020) Airport employees in Sweden exposed to PFAS through airport's waterworks	GM = 1.77 (+background) GM = 1.48 (-background)	<ul style="list-style-type: none"> • Alternate exposures were unlikely. • Small population (n = 17) and short follow up (5 months) • Exposures not greatly above background. 	No, assumed only background exposures from the referent population	Not clear from description
Li et al. (2018) Community: 106 Swedes in Ronneby, Sweden, exposed to PFAS through contaminated municipal drinking water: 2-year follow-up time	AM = 2.7	<ul style="list-style-type: none"> • Exposures in water, food, dust, air, and household products not monitored. • Study assumed exposure levels in the general population from all sources were negligible but excluded outliers that suggested ongoing exposure greater than the background of the control population. • Geometric mean is likely smaller. 	No, assumed only background exposures from the referent population	No, all isomers were combined
Gomis et al. (2017) Population-based cross-sectional biomonitoring data from USA (NHANES, 1999-2013) and Australia (2003-2011)	Men: AM = USA 2.4; Australia 2.1 Women: AM = USA 2.1; Australia 1.8	<ul style="list-style-type: none"> • Study noted that background human exposure was likely dominated historically by consumer products. • Geometric mean is likely smaller. 	No, modeling conducted on biomonitoring data	No distinction was made among isomers

Study population	Reported Half-life (years) ^a	Comments	Unmonitored Sources of PFOA Exposure Addressed?	PFOA Half-life Accounted for Isomers?
Gomis et al. (2016) Ski waxers: 4 male technicians occupationally exposed to airborne particles and fumes from hot ski wax; followed after marked reduction of occupational exposure	AM = 2.4	<ul style="list-style-type: none"> • Average reported as intrinsic (i.e., corrected for the ongoing background exposure from diet and drinks only. • Dermal exposure assumed negligible. • Geometric mean is likely smaller. 	No, during off duty assumed background exposures only	No mention was made of isomers
Zhang et al. (2013) General population: healthy volunteers in China N=86	AM = 2.3 GM = 1.7 Median = 2.0 Range (0.2-5.3) (young females, n = 20) AM = 2.8 GM = 1.2 Median = 1.8 Range (0.1-16) (all males and older females, n = 66)	<ul style="list-style-type: none"> • Study assumed volume of distribution of 170 mL/kg. • Discussion of background or ongoing exposures or exposures were not needed since half-lives were based on renal clearance. • Study notes that half-lives should be considered as upper limit estimates since not all elimination routes were studied. 	Not needed since study was based on estimated renal clearance	Yes, separate analysis done on straight and branched chains

Study population	Reported Half-life (years) ^a	Comments	Unmonitored Sources of PFOA Exposure Addressed?	PFOA Half-life Accounted for Isomers?
Bartell et al. (2010) 200 Americans (172 public water drinkers and 28 bottled water drinkers)	Median = 2.3 (all) Median = 2.1 (group eating homegrown vegetables)	<ul style="list-style-type: none"> • Water systems remained contaminated with PFOA to some extent for days to weeks after filtration began. • Study indicates their mean half-life is heavily influenced by the 12- month serum PFOA measurements and should be viewed as a preliminary estimate. • Geometric mean is likely smaller. 	No, assumed that “ongoing PFOA exposures only contribute negligible amounts”	Not mentioned
Olsen et al. (2007) Occupational workers: 26 retired fluorochemical production workers	GM = 3.5	<ul style="list-style-type: none"> • Study noted that it is unlikely that the potential for non-occupational exposures substantially distorted the elimination. • Study discussed other sources of exposure, but none was monitored in households of participants. 	Mentioned as possible but not monitored	Analysis done but separate half-lives not estimated

a) AM = arithmetic mean; GM = geometric mean.

b) Saturation of resorption is likely to occur at plasma concentrations above 10 µMoles/L, based on an estimated renal transporter Km of 4 µg/ml from an analysis of this clinical study of Elcombe et al. (2013) (Campbell et al. 2016, ARA, 2021)

Table 2. Studies selected with fewest issues of unmonitored sources of PFOA exposure, elimination, or isomer uncertainties.

Study population	Reported Half-life (years) ^a	Comments	Exposure, Isomer or Elimination Uncertainty
Elcombe et al. (2013)	AM 0.5	<ul style="list-style-type: none"> • Based on a new analysis of data from Elcombe et al. (2013) by Dourson and Gadagbui (2021) for 3 cancer patients • Patients received a single dose of PFOA with a 6 week follow up with serum levels likely to be below level of saturation of renal resorption 	<ul style="list-style-type: none"> • High dose in Elcombe et al. (2013) obviates the need for monitoring of other PFOA exposures • Single isomer was studied in Elcombe et al. (2013), so no uncertainty exists with this issue
Xu et al. (2020) Airport employees in Sweden exposed to PFAS through airport's waterworks	GM = 1.5	<ul style="list-style-type: none"> • Alternate exposures were unlikely. • Small population (n =17) and 5-month follow up • Exposures not greatly above background. 	<ul style="list-style-type: none"> • Other unmonitored exposures are possible, and if available would result in a lower intrinsic half-life. • Some uncertainty exists since branched PFOA isomers were studied in drinking water, but not reported in serum.

Study population	Reported Half-life (years) ^a	Comments	Exposure, Isomer or Elimination Uncertainty
Zhang et al. (2013) General population: healthy volunteers in China N=86	GM = 1.7 Median = 2.0 (young females, n = 20) GM = 1.2 Median = 1.8 (all males and older females, n = 66) Central tendency GM = 1.3 Median = 1.8	<ul style="list-style-type: none"> • Study assumed volume of distribution of 170 mL/kg. • Discussion of background or ongoing exposures or exposures were not needed since half-lives were based on renal clearance. • Study authors note that half-lives should be considered as upper limit estimates since not all elimination routes were studied. 	<ul style="list-style-type: none"> • No uncertainty in unmonitored exposures since renal clearance studied • Unmonitored elimination by other routes was likely which, if measured would result in a lower half-life • Multiple isomers were individually studied so no uncertainty exists with this issue

Table 3. Results from Consensus Polling of the International Group

Option	Preferred	Can live with	Cannot live with	Comments
1 (single study)	8	2	1	Zhang et al., 2013
2 (small group of studies)	4*	6	1	As in Table 2. *One vote with a special emphasis on Zhang et al., 2013
3 (larger group of studies)	2	1	2	As in Table 1.