

FACT SHEET

PFAS Action Plan Recommendations From EPN

April 27, 2021

EPA's current per- and polyfluoroalkyl substances ([PFAS](#)) [Action Plan](#), which was developed by the Trump administration, lacks a coherent framework for comprehensively addressing the health and environmental impacts of PFAS as a class. The manufacturing, use, and environmental release of most PFAS will continue for years if EPA bases its actions solely on the current plan. EPN recommends that the Biden administration develop a new, more proactive PFAS Action Plan to address these harmful chemicals, which have been found to pose immunological, developmental, reproductive, hepatic (liver), renal (kidney), hormonal, and carcinogenic effects.

EPN proposes moving away from an incremental individual chemical approach, reliant on federal government research and limited regulation, to a comprehensive class-based approach that achieves significant reductions in exposure and environmental releases and places greater responsibility on industry to fill critical data gaps. This approach will greatly accelerate progress in reducing risks from the 9,252 PFAS chemicals identified on [EPA's Master List of PFAS Substances](#)

EPN recommends that EPA develop a new PFAS Action Plan to achieve four main goals: 1) implement a systematic process for gathering and making public data on PFAS that combines federal and academic research with data developed by the companies manufacturing and processing these chemicals, 2) stop or severely restrict the introduction of new PFAS and new uses of existing PFAS to prevent further buildup of these chemicals in people and the environment, 3) eliminate all non-critical uses of existing PFAS, and 4) prevent and control releases of legacy and existing PFAS to the environment.

EPN makes specific recommendations on how EPA can achieve each of these four goals. To implement a systematic approach to data gathering, EPN recommends the use of various authorities under the Toxic Substances Control Act (TSCA) to require reporting of key information by all companies manufacturing, processing, or using PFAS (including impurities and byproducts). EPA should issue testing orders under Section 4 of TSCA to require industry to develop critical data now unavailable, including analytical methods and health effects studies to determine risks to exposed communities. EPN also recommends that EPA accelerate certification of PFAS mixtures methods such as Total Organic Fluorine (TOF) and Total Oxidizable Precursor Assay (TOPA), and begin including these measurements whenever individual PFAS chemicals are monitored.

To achieve the second goal of stopping or severely restricting new PFAS chemicals and new uses of existing PFAS chemicals, EPN recommends expanding TSCA data requirements to assure rigorous evaluation and restriction of new PFAS chemicals, eliminating any exemptions from new chemical review requirements, and promulgating rules requiring EPA approval of all new uses of existing PFAS.

To achieve the third goal of eliminating non-critical uses of existing PFAS, EPN recommends prioritizing all (or groups of PFAS) as a category under TSCA, and conducting risk evaluations and risk management rulemaking to limit uses to only those meeting the TSCA definition of a critical use.

To achieve the fourth goal of preventing environmental exposures to PFAS, EPN makes recommendations on how every EPA program can use existing authorities to address releases and discharges of PFAS across environmental media. Recommendations are included on how to prevent surface water and air contamination, set safe levels of PFAS in drinking water, remediate contaminated sites, and safely store PFAS wastes until safe disposal methods are identified.