Title: Per- and Polyfluoroalkyl Substances (PFAS) Position Statement

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BACKGROUND

Perfluoroalkyl and polyfluoroalkyl substances (PFAS), or "highly fluorinated chemicals", are a large group of synthetic chemicals that includes Perfluorooctanoic Acid (PFOA), Perfluorooctane Sulfonate (PFOS), and thousands of other fluorine-carbon bonded compounds created to mimic their function. Understanding the potential impacts of PFAS to human health and the environment continues to evolve, as well as understanding fate, transport, and effective treatment or mitigation methods. PFAS substances, which by design are resistant to heat, oils, stains, grease, and water—properties which contribute to their persistence in the environment and effective treatment difficulties—were first used commercially in the 1940s in products that include stain- and water-repellent fabrics, nonstick products, polishes, waxes, paints, cleaning products, and fire-fighting foams. The broad spectrum of uses has widely distributed PFAS throughout the water environment. In the 2000s, PFOS and PFOA began to be phased out in some countries due to environmental and health concerns; however, thousands of other PFAS continue to be used for a variety of functions.

As with other Contaminants of Emerging Concern (CECs), the water sector's understanding of effective treatment mitigation strategies; destruction technologies; analytical methods to detect PFAS in water, waste streams, and biosolids; and best practices for the safe handling of PFAS continue to evolve. While human health risk, detection methods, and treatment strategies for PFOS and PFOA in drinking water are well established, knowledge gaps remain for the risk, fate, transport, effective treatment and detection in other types of media. For the thousands of other PFAS compounds that replaced PFOS and PFOA, most do not have detection methods, and little is understood about their toxicity or need for treatment and destruction. Gaps in knowledge about these substances and concern about their persistence in the environment have led regulatory agencies to respond with a patchwork of standards for drinking water, industrial discharges, use of biosolids, and in some cases, production and use of PFAS-containing chemicals or products.

PFAS are introduced to the water environment from industrial discharges, consumer products entering landfills and wastewater, and through legacy contamination. Due to the circularity of water, and without effective and affordable destruction capabilities, PFAS contamination is transferred downstream or moved from one media to another. Involuntary receivers of PFAS contamination—including water resource recovery facilities, stormwater retention facilities, solid waste facilities, drinking water utilities, and anyone using ground and surface waters that contain PFAS—are dedicated to responsibly managing the risk of PFAS to human health and the environment, while balancing the affordability of these critical services that address our basic human needs.

ALIGNMENT WITH THE WATER ENVIRONMENT FEDERATION'S STRATEGIC GOALS

Since its founding in 1928, the Water Environment Federation (WEF) and its members have protected public health and the environment. As a global water sector leader, our mission is to inspire the water community in pursuit of human and environmental well-being to create a life free of water challenges. The PFAS Position Statement aligns with WEF's support for the following WEF Strategic Goals:

- Goal 1: Attract and develop a diverse and passionate water workforce
 - Strategy 1: Raise public awareness about the importance of water and the water workforce
 - o Strategy 4: Cultivate strategic partnerships
- Goal 2: Cultivate a purpose-driven community to sustainably solve water challenges for all.
 - o Strategy 1: Drive connection and collaboration for the development of innovative solutions.

- Goal 3: Lead the transformation to the Circular Water Economy
 - o Strategy 3: Champion adoption of Circular Water Economy
 - o Strategy 4: Eliminate barriers to Circular Water Economy

POSITION

Protecting public health and the environment has always been, and continues to be, the daily mission of water professionals worldwide. WEF is concerned about the presence of PFAS in our communities and the knowledge gaps around health impacts, fate and transport, treatment, disposal, and safe handling of the more than 40,000 chemicals that have been introduced into global commerce. Water professionals are dedicated to responsibly managing the risk of PFAS in water, wastewater, and biosolids. The water community stands as a last line of defense against PFAS contamination, but to ensure long term protection from PFAS, policy makers need to address the source of contamination. WEF's position is as follows:

- Stop PFAS at the Source: Advocate for best management practices through source control, including
 industrial pre-treatment programs, source identification strategies, product and chemical restrictions, or
 other measures, as the first line of defense for involuntary receivers of PFAS contamination.
- Support Government Funding: Advocate for reliable, affordable, and sufficient funding mechanisms to support PFAS research and mitigation efforts. Support legislation and regulations that consider treatment and disposal costs and provide adequate funding for involuntary receivers to appropriately address PFAS contamination without placing a financial burden on ratepayers.
- Support Balanced Remediation Costs Policies: Advocate for policies that lower the direct costs of PFAS
 remediation and management for involuntary receivers and their ratepayers, shifting those costs to PFAS
 producers, users, and generators.
- Integrate Circular Water Solutions: Identify and share solutions that both address PFAS contamination
 and advance the circular water economy, such as through water reuse. Advocate for responsible land
 application of biosolids in accordance with best management practices (see WEF's <u>Biosolids Position</u>
 Statement for additional information.)
- Use Science-Based Policymaking: Prioritize the development of timely health and environmental assessments; standardized and certified analytical methods for detecting PFAS in water, wastewater, and biosolids, and nationally recognized risk-based standards. These standards should incorporate proven mitigation strategies and effective source control measures.
- Encourage Investment in Research and Development: Advocate for increased and sustained funding for
 effective PFAS mitigation strategies, removal and destruction technologies, detection methods, and costbenefit tools to respond to concerns about PFAS in water, waste streams, and biosolids.
- Support Education and Training: Equip water professionals with the knowledge and skills necessary to
 identify and communicate PFAS risks in their community; implement source control strategies; install,
 operate, and maintain treatment and destruction technologies; and safely handle PFAS-contaminated
 waste streams or media, liquid or solid.
- Engage a Broad Community: Engage policymakers, legislators, community leaders, students, and the general public about how they can mitigate PFAS contamination in our shared environment.