Dear Representative (INSERT NAME HERE)

My name is\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and I am \_\_\_\_\_\_\_\_\_\_\_\_ at \_\_\_\_\_\_\_\_\_\_\_\_\_\_. I am writing to you about the current PFAS regulations that are under consideration.

PFAS Chemicals are not all the same: All PFAS chemicals are not equal and should not be regulated as if they are. Each should be treated differently according  to its application and toxicity. Umbrella legislation or regulation against all PFAS could end the use of non‐harmful fluoropolymers such as FKM and PTFE. These polymers are necessary for so many key applications that are used in everyday life and enable safe function of thousands of products. In short, these polymers are protectors of people, the environment and industrial equipment.

These fluoropolymers in their finished form are well studied and have not been linked to water or soil contamination. In fact, in the UK, they specifically call out fluoroelastomers and fluoroplastics as low hazard groups and suggest that they be exempt from any future PFAS restriction proposals in the UK. The Organisation for Economic Co-operation and Development (OECD) themselves, which created the definition of PFAS many of these regulations use, stated “The decision to broaden the definition compared to Buck et al. is not connected to decisions on how PFASs should be grouped in regulatory and voluntary actions.” Despite this statement however, this overly broad definition is being used with potentially damaging consequences. In the US, the current definition of PFAS not only includes the harmful, liquid and migratory PFAS chemicals but the fluoropolymers themselves are subject to impending regulation as well, due to their structure fitting this ill-formed definition. These fluoropolymers pose no health risks and are used in many industries such as infrastructure, aerospace, military, medical, food processing, mobility, power generation semiconductor, and green energy (including lithium batteries). Their properties such as corrosion resistance, chemical resistance, and energy saving properties are ensuring safe and reliable function every minute of every day. To date, there is not an alternative to these polymers.

While we agree that PFAS substances can be harmful and need to be regulated, we recommend that lawmakers use a science-based approach to regulate harmful PFAS chemicals, such as PFOA and PFOS. We also urge that regulating bodies base regulations on standardized test methods and acceptance limits of materials deemed harmful by the EPA. The EPA and other regulating bodies should exempt these polymers, as the UK is doing by refining the definition that is used today. Further, the EPA should keep using the grouping concept to distinguish hazardous chemicals from non-hazardous in making determinations; the scope of any regulation should exclude all chemicals deemed non-harmful.

Thank you for your time and considering my request.

Sincerely,

[Insert Your Name]