

September 22, 2022

The Endocrine Society appreciates the opportunity to provide comments on the designation of PFOA and PFOS as CERCLA hazardous substances. Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization of scientists and healthcare professionals dedicated to research on hormones and the clinical treatment of patients with endocrine diseases. Our membership includes 18,000 clinicians and scientists from over 120 countries, including many researchers engaged in the study of the adverse effects of per- and polyfluoroalkyl substances (PFAS) on endocrine systems. These chemicals have been shown to disrupt the endocrine system in humans; exposure can lead to cancer, thyroid disruption, reproductive difficulties, and other endocrine disorders.

Because of the known adverse effects on the endocrine system, we are writing in support of the designation of PFOA and PFOS as CERCLA hazardous substances. This is an important first step in holding polluters accountable for the release of these toxic substances into the environment.

While this designation is critically important, an overarching challenge in addressing PFAS contamination in our environment is that this is an extensive group comprising at least 9,000 similar compounds with detailed information on only a few chemicals. Considering this, it is unrealistic to expect that we can ever achieve comprehensive toxicity data on all members of this growing class of chemicals. We believe the EPA should build on recent progress and work with academic researchers and across federal agencies to develop a common definition of PFAS, with the goal of enabling researchers and regulatory agencies to assess and restrict these chemicals as a class. PFAS classes should be determined based not just on exposure data and chemicals that are co-located or utilized together, but also on other parameters such as structure and activity. Known hazards in well-studied compounds should be assumed for similar structures that have little or no data available until the data gaps are filled and in the public domain. These classes should be defined and acted upon with urgency, given current known and presumed levels of contamination.

In conclusion, the Endocrine Society strongly supports the designation of PFOA and PFOS as hazardous chemicals under CERCLA. This designation is in line with the accumulating evidence that shows these chemicals act as endocrine disruptors, can accumulate in the environment and in the human body, and can result in adverse health effects in humans and wildlife. However, there are thousands of other chemicals with similar structure, and presumably the same function, that remain unregulated. We urge the EPA to regulate PFAS as a class of chemicals for the protection of public health and the environment.