Per- and polyfluoroalkyl substances (PFAS) are a large group of man-made toxic chemicals used to make consumer products resistant to water, grease or stains. Human health studies have shown that exposure to certain PFAS may affect growth, learning, and behavior of infants and older children, lower a woman’s chance of getting pregnant, interfere with the body’s natural hormones, increase cholesterol levels, affect the immune system, and increase the risk of cancer.¹

The major types of human exposure sources for PFAS include contaminated drinking water and food contaminated with PFAS, including fish and shellfish. Other human exposure pathways include incidental soil/dust ingestion, dermal exposure and inhalation.

Approaching PFAS as a class for assessing exposure and biological impact is the best way to protect public health.² Approaching PFAS as a class for assessing exposure and biological impact is the best way to protect public health.² Assessing risks of chemicals having a similar mechanism of toxicity is not unusual and is similar to how other chemical groups such as dioxins and PCBs have been assessed and regulated.

A class approach is also consistent with environmental field data which consistently finds PFAS as a mixture of widely varying relative ratios and combinations which, in turn, may shift in response to other factors such as aerobic conditions. And further, a class approach is made necessary by the fact that manufacturers and responsible parties uniformly refuse to disclose PFAS product content and composition, arguing that such information is proprietary.

So far, 26 PFAS chemicals have been detected in or pose a threat to the Wisconsin’s groundwater,³ and as analytical methods for PFAS continue to evolve and improve, this number will quickly escalate.

For these reasons, we are unable to support regulations or corresponding legislation that address only a very few PFAS compounds and that address only one pathway of exposure such as groundwater.

ENDORSED by the following 28 Wisconsin organizations:

- Casa Maria Community
- Code PFAS
- Citizens for Safe Water Around Badger
- Clean Water Action Council of Northeast Wisconsin
- Concerned Friends and Neighbors
- Crawford Stewardship Project
- Family Farm Defenders
- Farms Not Factories
- Fire Fighter Cancer Foundation
- Friends of Lake Wingra*
- Four Lakes Green Party
- Headwater LLC
- Midwest Environmental Advocates
- Midwest Environmental Justice Organization
- Nukewatch
- PFAS Community Campaign
- People Empowered Protect the Land (PEPL) of Rosendale*
- Physicians for Social Responsibility Wisconsin
- Protect Wood County and Its Neighbors*
- Sierra Club – John Muir Chapter
- Sustain Rural Wisconsin Network
- Twin Ports Action Alliance
- Wisconsin Conservation Voters
- Wisconsin Environmental Health Network (WEHN)
- Wisconsin Environment
- Wisconsin Network for Peace, Justice & Sustainability
- Wisconsin Resources Protection Council
- Wisconsin Wildlife Federation

*Added after April 4, 2019

For more information, contact:
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² Dr. Birnbaum (Director of the National Institute of Environmental Health Sciences and National Toxicology Program of the National Institutes of Health) in testimony before the Senate Committee on Homeland Security and Governmental Affairs, Subcommittee on Federal Spending Oversight and Emergency Management, Sept. 26, 2018.
³ S. Elmore, Wisconsin DNR, January 17, 2019 correspondence to Laura Olah, Executive Director, Citizens for Safe Water Around RE: Public Petition for Health Advisory Levels for PFAS in Groundwater and Drinking Water with Emphasis on the Tyco/Johnson Controls PFAS site - BRRTS Activity No. 02-38-580694.