

February 3, 2020

Environmental Protection Agency
EPA Docket Center (EPA/DC), Mail Code 28221T
Attention Docket ID No. EPA-HQ-TRI-2019-0375-0001
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Wheeler:

As faith-based organizations committed to caring for God's creation, we are writing regarding the Advanced Notice of Proposed Rulemaking for the Addition of Certain Per- and Polyfluoroalkyl Substances: Community Right-to-Know Toxic Chemical Release Reporting. Because of our call to be stewards of the earth and to protect vulnerable populations, we firmly support the addition of all per- and polyfluoroalkyl substances (PFAS) manufactured and used in the United States to the Toxics Release Inventory (TRI). Protecting human health and all of God's creation requires strengthening regulatory and reporting standards for these chemicals.

The healthy future that our religious traditions envision for all people is threatened by PFAS chemicals, which contaminate our water supplies and exist in various consumer products. Low-income communities and communities of color, for whom we are particularly called to care, are especially affected. Of the approximately 600 PFAS chemicals used in the United States, only perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) have been studied extensively. As the Environmental Protection Agency has noted, these chemicals accumulate in nature and the human body over time. Evidence indicates that communities subjected to prolonged PFAS exposure will experience adverse health effects. Documented effects include reproductive and immune system disruption, impaired fetal development, birth defects, thyroid problems, and certain cancers.

These established chronic human health risks and environmental effects attributed to PFOA and PFOS clearly display a level of toxicity which qualifies for addition to the TRI. A reporting threshold that is lower than the standard statutory threshold must also be established for these chemicals.

Additionally, we ask that all other PFAS chemicals manufactured and used in the United States be evaluated for listing in the TRI. The single-chemical regulatory approach fails to protect the communities we serve from unnecessary exposure to dangerous PFAS. For example, the short-chain PFAS chemical known as GenX was heralded as a safer alternative to PFOA, but studies now suggest it may have many of the same harmful effects. Unregulated industrial chemicals such as these must not continue to cause unjust suffering in countless communities in the United States.

The moral responsibility of protecting communities from harmful chemical contaminations cannot be overlooked. Providing the public with access to information regarding potential exposure to PFAS chemicals furthers the mission of protecting human health and caring for the air, land and water upon which all of God's creation depends. As religious organizations in

pursuit of a healthy and abundant life for the communities we care for, we support the addition of PFOA, PFOS, and other PFAS chemicals to the TRI. We also urge the establishment of low reporting thresholds for PFAS, which is in line with scientific research of PFAS health impacts.

Sincerely,

Adrian Dominican Sisters, Portfolio Advisory Board
Boston Common Asset Management
Christian Reformed Church Office of Social Justice
Church World Service
CommonSpirit Health
Congregation of St. Joseph
Creation Justice Ministries
Daughters of Charity, Province of St. Louise
Dominican Sisters of Sparkill
Evangelical Lutheran Church in America
Figure 8 Investment Strategies
Franciscan Action Network
Friends Committee on National Legislation
Interfaith Center for Corporate Responsibility
Investor Advocates for Social Justice
Leadership Conference of Women Religious
Maryknoll Sisters Eastern Region USA
Mercy Investment Services, Inc.
Northwest Coalition for Responsible Investment
Presbyterian Church (U.S.A.), Office of Public Witness
Region VI Coalition for Responsible Investment
School Sisters of Notre Cooperative Investment Fund
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Unitarian Universalist Ministry for the Earth
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