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Dear Prof Ian Cousins,

Thank you and other signatories for your joint letter of 24 October about per- and polyfluoroalkyl substances (PFAS) and kind congratulatory words. I apologise for the delay in responding to you.

PFAS are a global challenge, and their persistence unfortunately means there are no 'quick fixes.' We have been working for over two decades with international counterparts to monitor, ban or highly restrict certain chemicals and address issues caused by their historic use. The government recognises the need for further action on PFAS as we are committed to protecting human health and delivering a better environment now and in the future.

Of the thousands of PFAS which exist, only a few hundred are across the UK and not all PFAS present the same risks. Many have very useful properties for which safer and more sustainable alternatives are not yet available. In order to effectively investigate the large range of PFAS, and to help prevent regrettable substitution, a grouping approach was used in the Regulatory Management Options Analysis (RMOA). The groups are based on structural similarity as an analogue for similarity in hazard profile. The working definition of PFAS in the RMOA is based on the Organisation for Economic Co-operation and Development's definition but differs from that adopted in other jurisdictions as it excludes PFAS with a single isolated methylene (-CF2) group. This definition presents a pragmatic approach to restricting the scope of the RMOA to persistent PFAS and their precursors. This definition does not constrain the scope of any future restrictions, which may extend to a wider range of PFAS. The RMOA published in April 2023 only forms part of ongoing government work to address risks from PFAS, and the evidence base continues to evolve. We will build on the work within the RMOA and other work both across government and internationally, to set out our approach to PFAS management.

We have already started work on a UK REACH dossier investigating whether to restrict the use of other PFAS in firefighting foams, and we are exploring how further action could be taken across a wide range of industrial and consumer uses. We are following progress of the EU restrictions currently being prepared on PFAS. However, it is not yet clear what the final EU restrictions will cover: several stages remain before EU restrictions are adopted, including further consultation periods and provision for derogations.

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The RMOA also recommended that EEA-NH4, which raises concerns in terms of reproductive toxicity, is considered as a new entry in the GB Mandatory Classification and Labelling (MCL) list. The Health and Safety Executive are currently working on a targeted human health GB Article 37A MCL proposal for EEA-NH4, which will be published for public consultation in early 2025. If a new GB MCL entry is agreed, the classification could also prompt other measures in REACH such as Substance of Very High Concern (SVHC) listing and the recognition of certain risk management and control with respect to supply, use and disposal.

Separately, we have also commissioned a project to analyse policy ideas from a stakeholder PFAS Working Group aimed at accelerating industry leadership in the transition away from PFAS. Other work continues across government to help us assess levels of PFAS occurring in the environment, their sources, and potential risks to inform policy and regulatory approaches.

The work across government includes the Environment Agency (EA) Risk Screening Project, which is part of the wider programme of the EA's delivery on PFAS. The EA will share the findings of this multiyear project with partners in government to support their duties and responsibilities, and to inform our regulatory approach to PFAS.

The UK Health Security Agency (UKHSA) is aware of the potential risks to human health from PFAS. The UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) is currently undertaking a review of the available evidence on the health effects of PFAS to support the risk assessment of these substances. UKHSA keeps up to date with new evidence and uses this information to develop its public health advice. The Drinking Water Inspectorate has established an Advisory Group of technical experts to recommend revisions to water quality standards, applicable to England and Wales. The Inspectorate's consolidated guidance which was issued to water companies in 2024 sets out the expectations regarding PFAS monitoring, reporting, risk assessment, remediation, and long-term planning. The Inspectorate will update its guidance as required if evidence becomes available when the World Health Organisation and COT reviews are complete.

Yours sincerely,



EMMA HARDY MP