

# *The concept of essential use of Per- and Poly-fluoroalkyl Substances (PFAS)*

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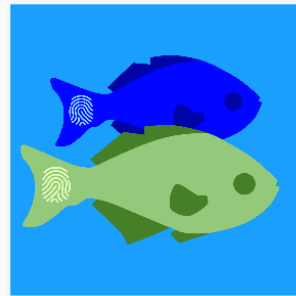
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*WI DNR Oct'22*

# STEEP

Sources, Transport, Exposure & Effects of PFASs  
UNIVERSITY OF RHODE ISLAND SUPERFUND RESEARCH PROGRAM

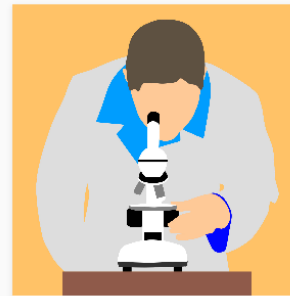
## Connecting science and people



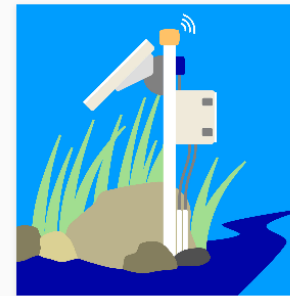
**STEEP Research:  
Environmental Fate  
& Transport**



**STEEP Research:  
Childhood Risk**



**STEEP Research:  
Metabolic Effects**



**STEEP Research:  
Detection Tools**



**STEEP Core: Next  
Generation**



**STEEP Core:  
Research  
Translation**



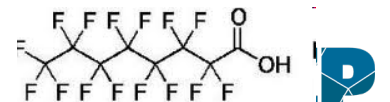
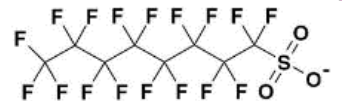
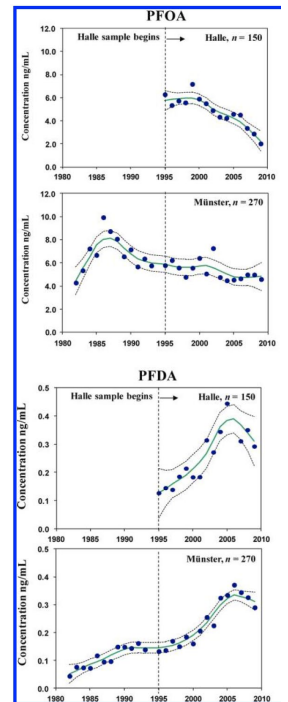
**STEEP Core:  
Community  
Engagement**



**STEEP Core:  
Administrative**

# Concern about PFASs

- Widespread human and environmental exposure
  - Particularly perfluorinated C<sub>8</sub> compounds – PFOS and PFOA (Yeung et al., 2013)
- Wide range of adverse effects (humans/animals)
  - Immunosuppression (DeWitt et al., 2008; Grandjean et al., 2013)
  - More PFOA, higher risk of being overweight (Haldersson et al., 2012)
  - Link [PFOA] in blood and insulin resistance (Timmermann et al., 2014)
- Regulatory action (PFOS withdrawal and PFOA action plan)
- Replacement with other fluorinated compounds (shorter, polyfluorinated; more complex molecules - precursors)



1000s of PFAS  
100s produced \*  
10s monitored  
2 targeted (EPA)

• Categories:

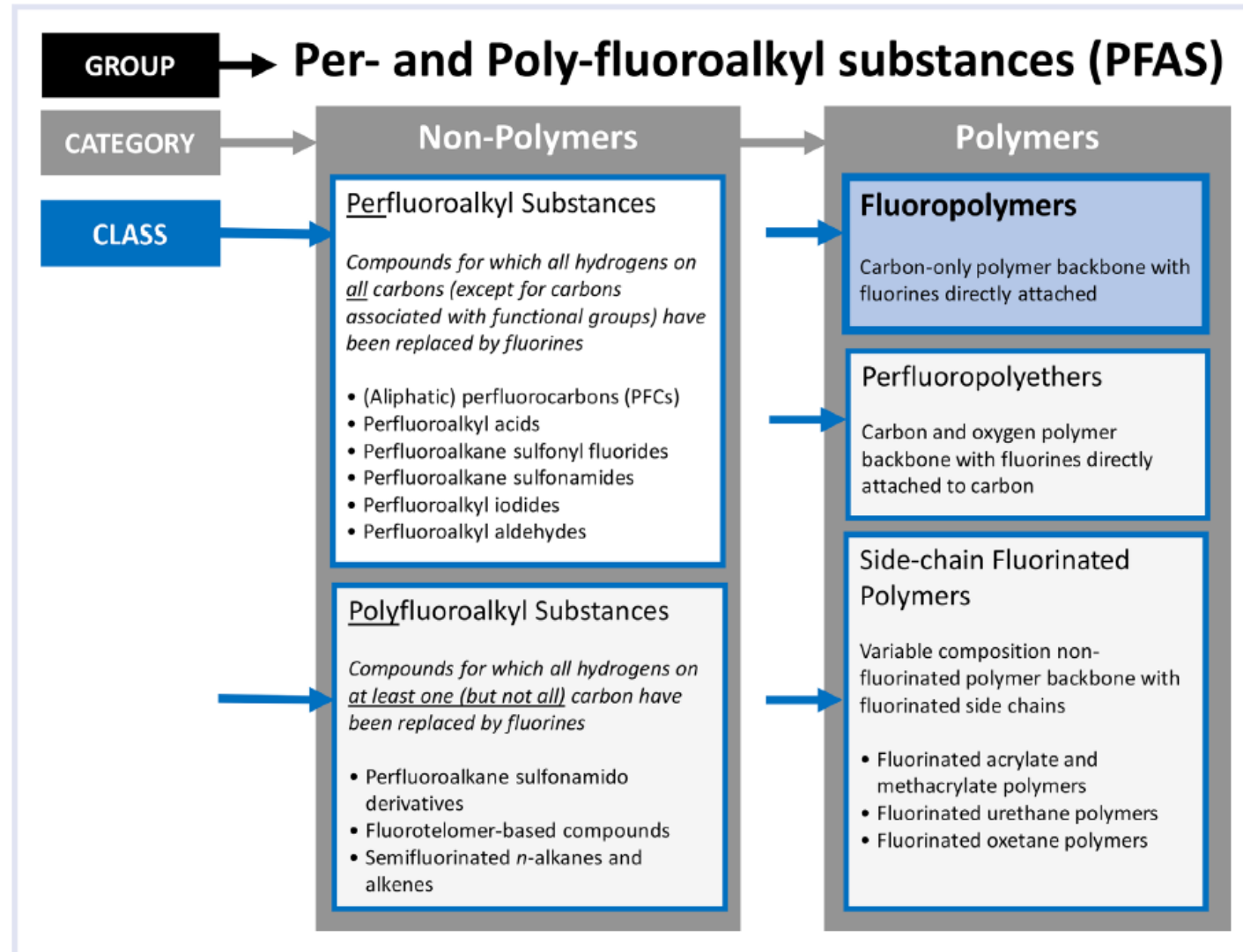
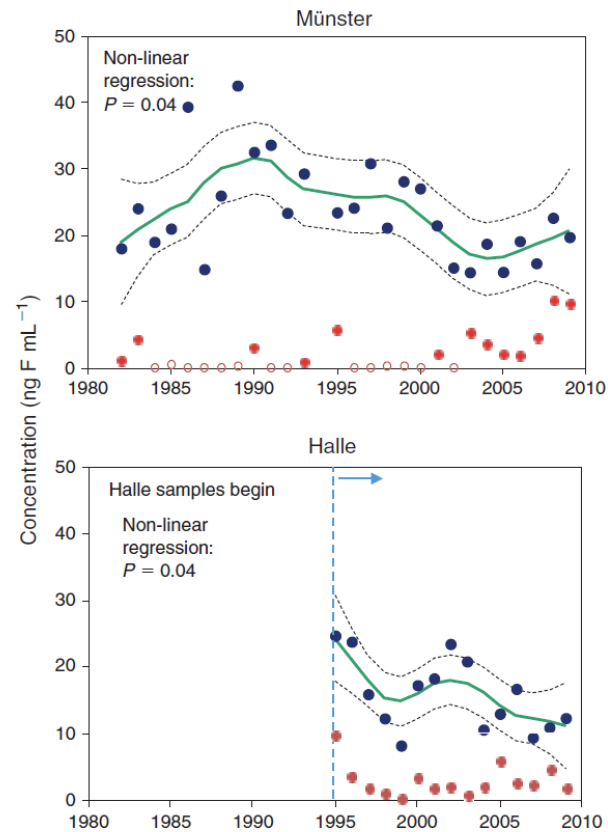
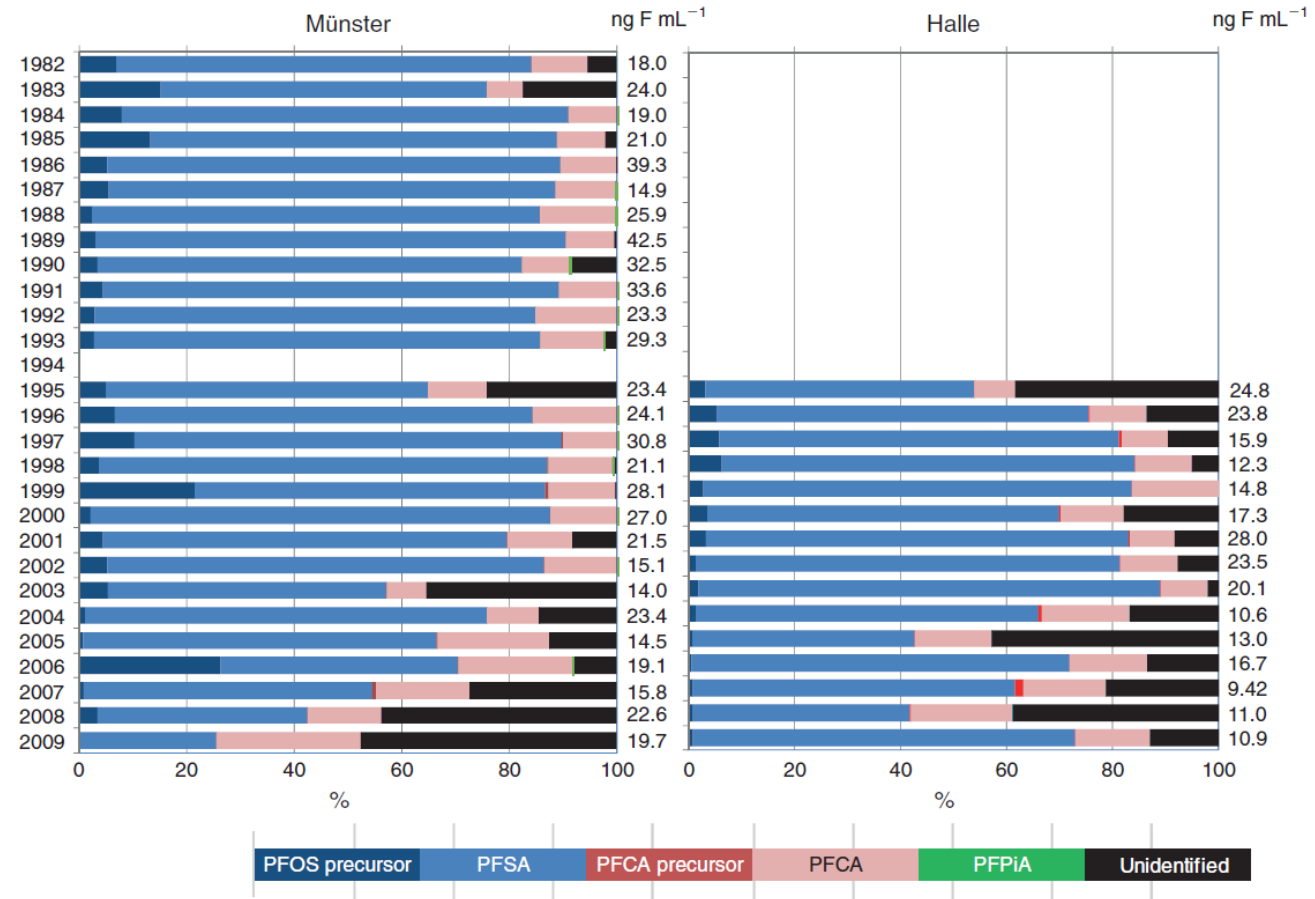


Figure 1. Per- and polyfluoroalkyl substances (PFAS).

# The known unknowns are getting us



**Fig. 3.** Temporal trends of extractable organofluorine (EOF) and unidentified organofluorine concentrations ( $\text{ng F mL}^{-1}$ ) in German plasma. (Blue dot indicates the mean value of EOF, dotted line indicates the 95% confidence interval of the trend and green line indicates the trend generated using locally weighted regression smoother (LOESS); red dot indicates the mean value of unidentified organofluorine; open red dots indicates no unidentified organofluorine.)



**Fig. 4.** Composition and concentrations ( $\text{ng F mL}^{-1}$ ) of extractable organofluorine (EOF) in German blood plasma samples (perfluorooctane sulfonate, PFOS; perfluoroalkyl sulfonate, PFSA; perfluorinated carboxylates, PFCAs; perfluorinated phosphinates, PFPiAs).

(Yeung and Mabury, 2016)

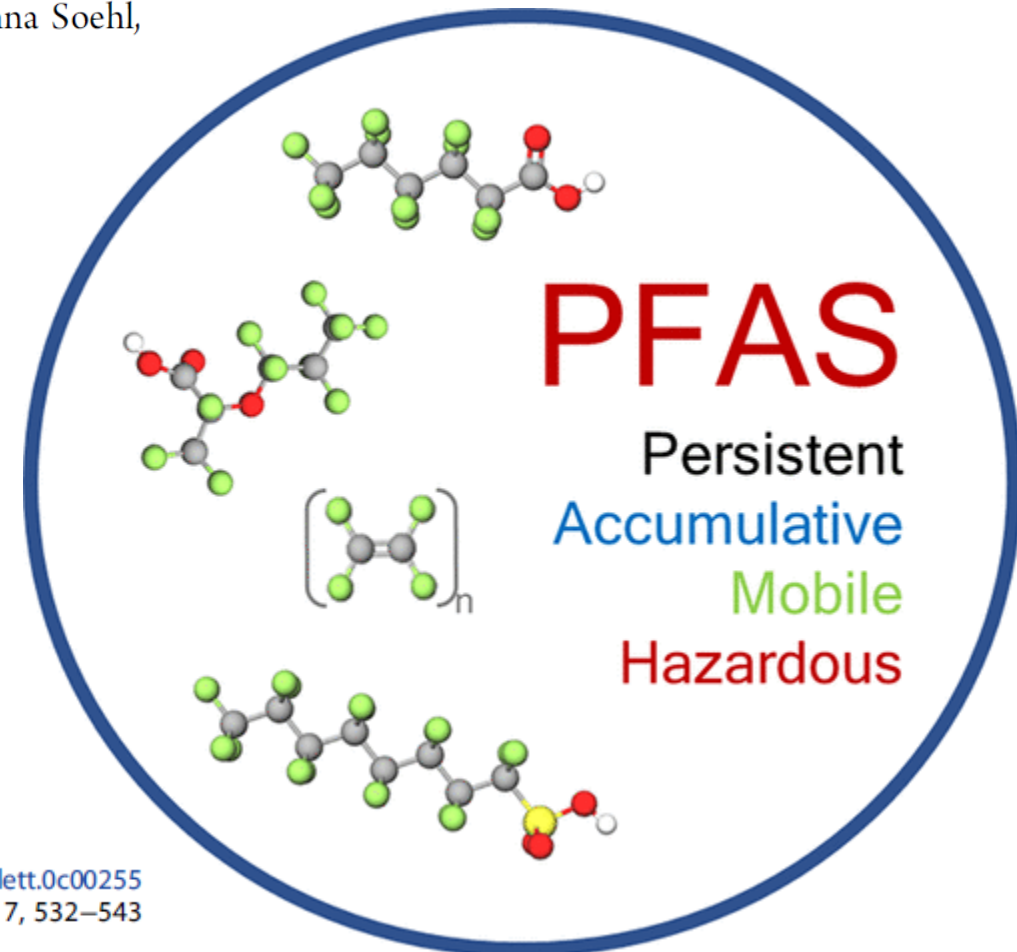
# 1 option – PFAS as a class

## Scientific Basis for Managing PFAS as a Chemical Class

Carol F. Kwiatkowski,\* David Q. Andrews, Linda S. Birnbaum, Thomas A. Bruton, Jamie C. DeWitt, Detlef R. U. Knappe, Maricel V. Maffini, Mark F. Miller, Katherine E. Pelch, Anna Reade, Anna Soehl, Xenia Trier, Marta Venier, Charlotte C. Wagner, Zhanyun Wang, and Arlene Blum

### Box Key Messages

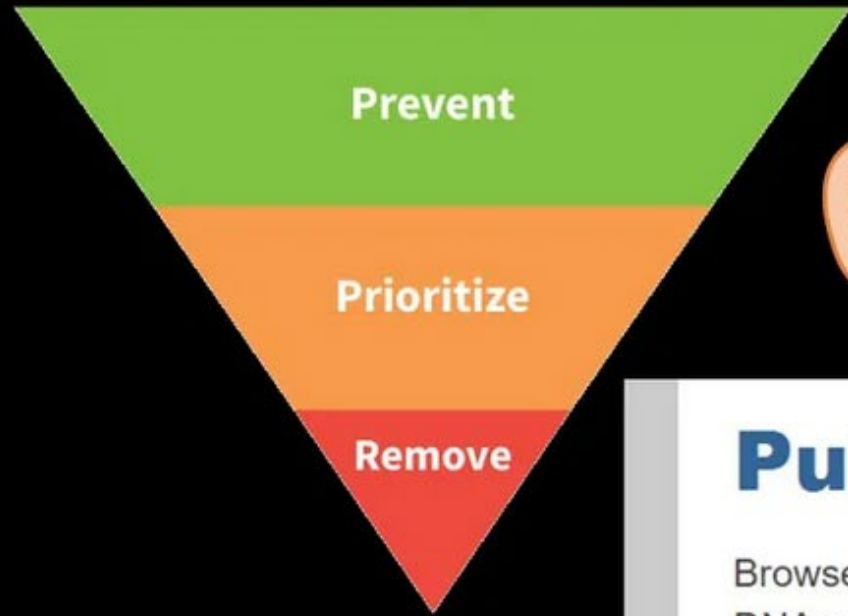
1. Per- and polyfluoroalkyl substances (PFAS) make up a class of extremely persistent chemicals, numbering in the thousands, that accumulate in the environment and living organisms and can be highly mobile, leading to global contamination.
2. The use of PFAS in numerous consumer and industrial applications has led to widespread human and environmental exposure from, for example, drinking water, food, and consumer products.
3. Toxicological and epidemiological studies have identified a broad range of adverse health outcomes associated with exposure to PFAS in people and animals.
4. We suggest a class-based approach to managing the human and environmental risks associated with all PFAS, including polymers.
5. We provide options for how governments and industry can apply the class-based approach, emphasizing the importance of eliminating non-essential uses of PFAS, and further developing safer alternatives and methods to remove all existing PFAS from the environment.



<https://dx.doi.org/10.1021/acs.estlett.0c00255>  
*Environ. Sci. Technol. Lett.* 2020, 7, 532–543



# Zero PM



# 6 million PFAS

## PubChem Classification Browser

Browse PubChem data using a classification of interest, or search for PubChem re (DNA repair). More...

Select classification

**PubChem: PFAS and Fluorinated Compounds in PubChem**

0:00 / 22:58

#PFAS #PMT #Zeropollution

Navigating over 6 million PFAS! A walk through the PFAS tree with Emma Schymanski

# Products that do or did contain PFAS





# PFAS are in over 60 different use categories

Are all of these uses essential?

Personal care products/cosmetics	Ski waxes	Fire-fighting foams	Apparel
Waterproof clothing	Easy care clothing	Food contact materials	Food production equipment
Medical devices	Pharmaceuticals	Laboratory supplies	Carpets and furniture
Cleaning products	Paint and lacquers	Pesticides	Sealants
<i>These are only a few of the known use categories for PFAS.</i>			

What is an essential use for a PFAS?



Cite this: DOI: 10.1039/c9em00163h

## The concept of essential use for determining when uses of PFASs can be phased out

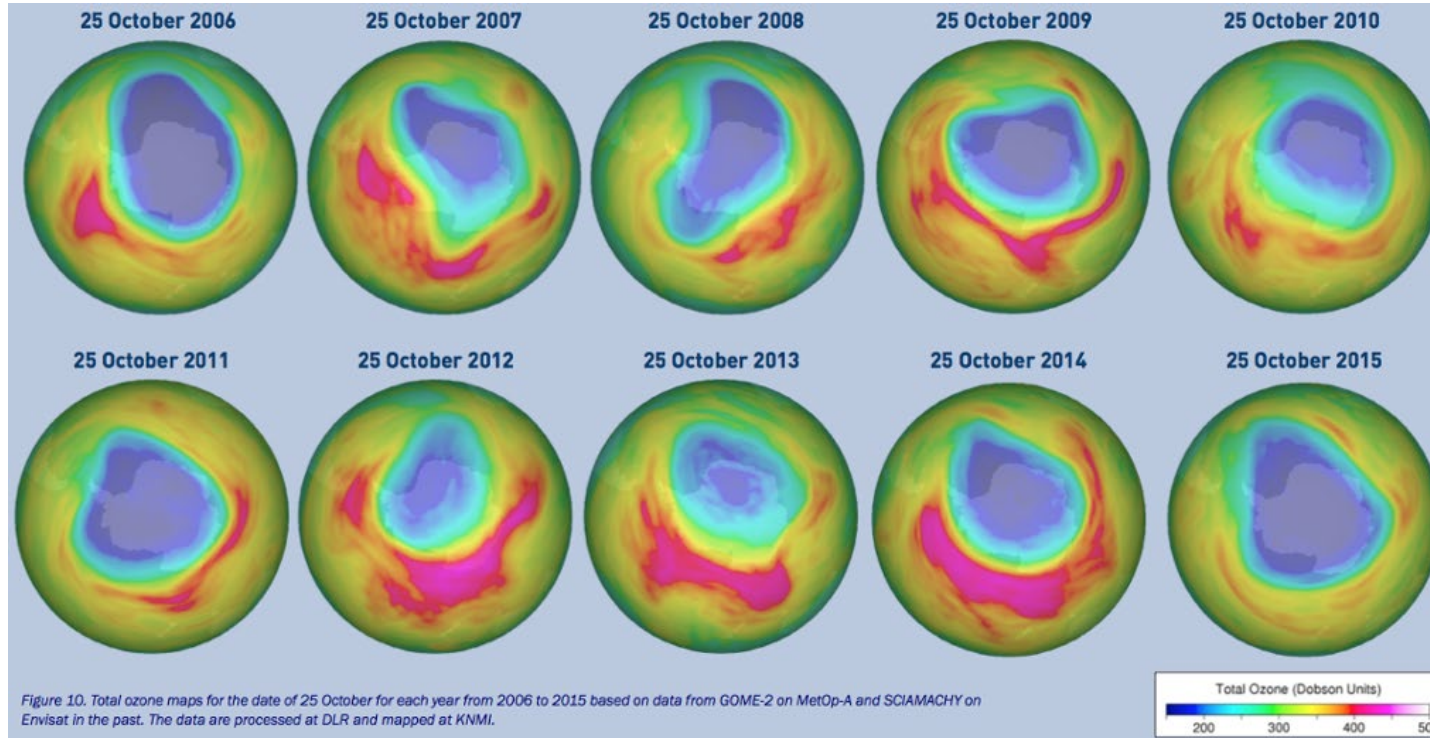
Ian T. Cousins,<sup>a</sup> Greta Goldenman,<sup>b</sup> Dorte Herzke,<sup>c</sup> Rainer Lohmann,<sup>d</sup> Mark Miller,<sup>e</sup> Carla A. Ng,<sup>f</sup> Sharyle Patton,<sup>g</sup> Martin Scheringer,<sup>h</sup> Xenia Trier,<sup>i</sup> Lena Vierke,<sup>j</sup> Zhanyun Wang,<sup>k</sup> and Jamie C. DeWitt<sup>l</sup>

*Based on these definitions, how many use categories can we define for PFAS?*

Based on the Montreal Protocol, which defined the concept of essential use for chlorofluorocarbons (CFCs).

- An essential use is a use necessary for health or safety or for the functioning of society.
- An essential use is a use for which there are no available technically and economically feasible alternatives.

# We had a gaping hole



Adopted on 15 September 1987, the Protocol is to date the only UN treaty ever that has been ratified every country on Earth - all 198 UN Member States.

Photograph: WMO

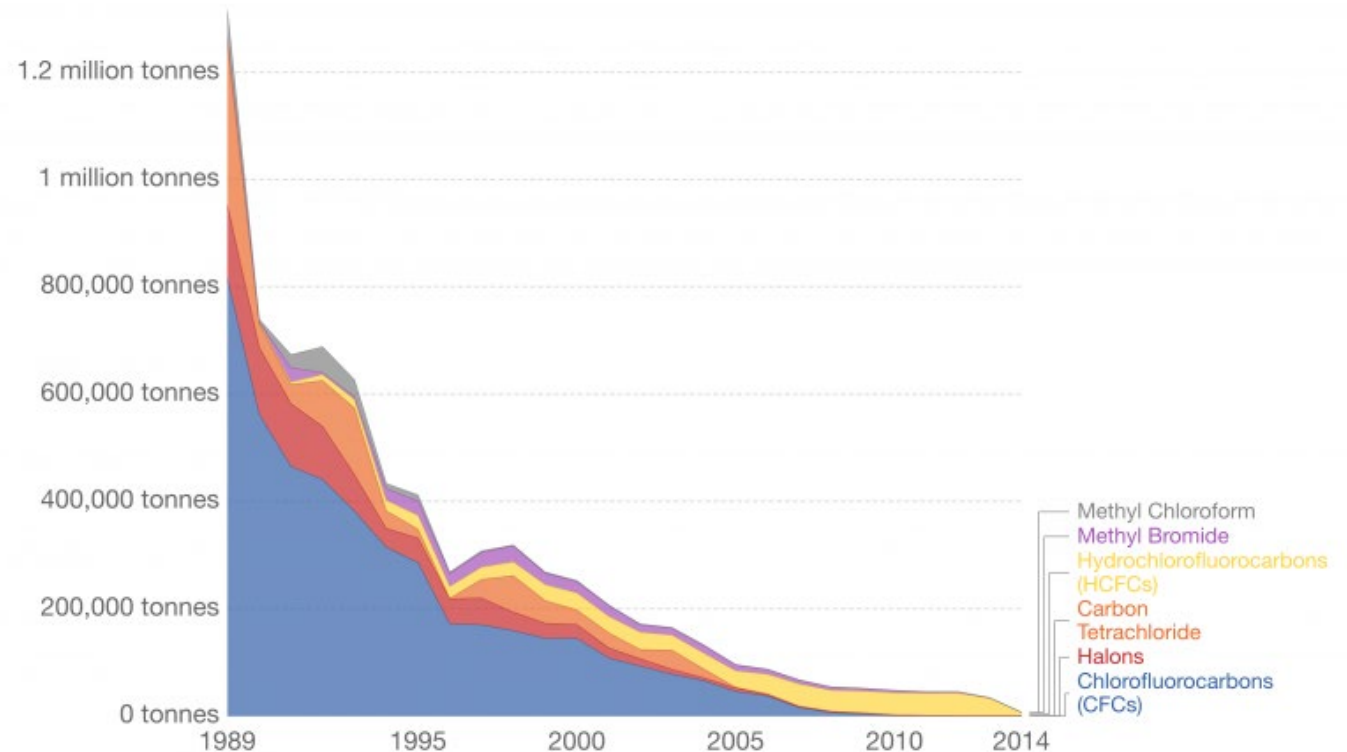
# For background – ozone had gone missing

Sequential progress,  
not simply regrettable  
substitutions:

- CFCs (MP)
- HCFCs (Montreal Amendment)
- HFCs (Kigali Amendment)

Ozone-depleting substance consumption, World

Annual consumption of ozone-depleting substances (ODS). ODS consumption is measured units of ODS tonnes, which is the amount of ODS consumed, multiplied by their respective ozone depleting potential value.

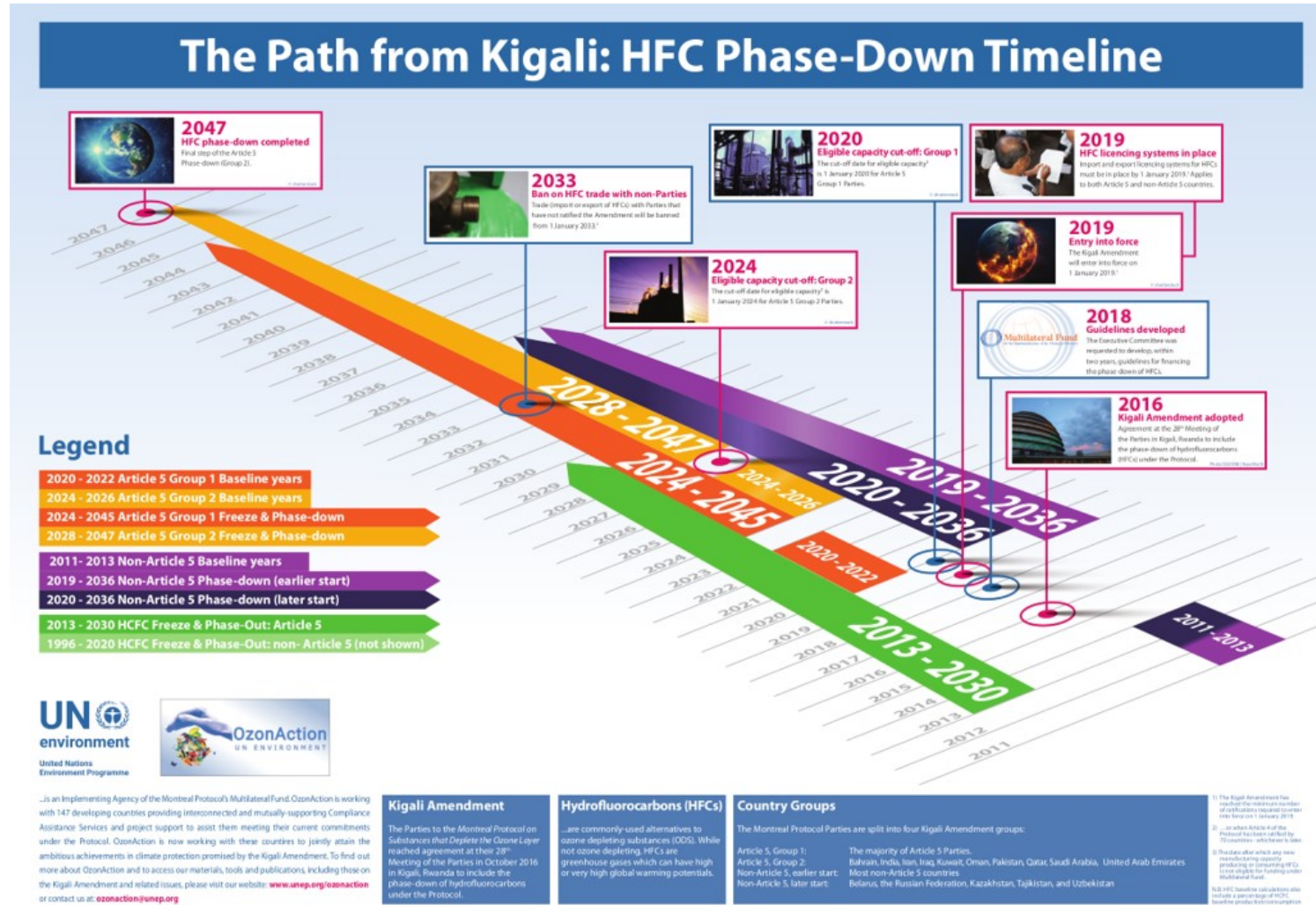


Source: UN Environment Programme

OurWorldInData.org • CC BY-SA



# Leading the way



# Essential use concept for PFAS

**Table 1** Three essentiality categories to aid the phase out of non-essential uses of chemicals of concern, exemplified with PFAS uses

Category	Definition	PFAS examples
(1) “Non-essential”	Uses that are not essential for health and safety, and the functioning of society. The use of substances is driven primarily by market opportunity	Dental floss, water-repellent surfer shorts, ski waxes
(2) “Substitutable”	Uses that have come to be regarded as essential because they perform important functions, but where alternatives to the substances have now been developed that have equivalent functionality and adequate performance, which makes those uses of the substances no longer essential	Most uses of AFFFs, certain water-resistant textiles
(3) “Essential”	Uses considered essential because they are necessary for health or safety or other highly important purposes and for which alternatives are not yet established <sup>a</sup>	Certain medical devices, occupational protective clothing

<sup>a</sup> This essentiality should not be considered permanent; rather, a constant pressure is needed to search for alternatives in order to move these uses into category 2 above.

Table 2 Essentiality of PFASs in selected use categories

Use	Table 1 Category <sup>a</sup>
Personal care products including cosmetics	1
Ski waxes	1
Fire-fighting foams (commercial airports)	2
Fire-fighting foams (military)	2 or 3
Apparel (medical: long operations)	3
Apparel (protective clothing oil and gas industry)	3
Apparel (medical: short operations, everyday)	2
Apparel (military: occupational protection)	2 or 3
Waterproof jacket (general use)	2
Easy care clothing	1
Food contact materials	1, 2 or 3
Non-stick kitchenware (fluoropolymers)	1 or 2
Medical devices (fluoropolymers)	1, 2 or 3
Pharmaceuticals	2 or 3
Laboratory supplies, equipment and instrumentation	1, 2 or 3
Perfluorosulfonic membranes in fuel cells	2
Perfluorosulfonic membranes in chlor-alkali process	3

<sup>a</sup> Note that the categories in the above table represent the current evaluation and may change in the future.

# Essential use concept for PFAS

“When considering chemical alternatives for PFASs, the focus should be on the service the product should deliver. The compound should therefore be evaluated for performance using the specifications required for the product as opposed to comparing directly to the PFAS being replaced...

Additionally, the potential for health hazard and potential for exposure...must be considered...”



PFAS in personal care products and cosmetics such as hair products, powder, sun blocks, and skin creams.



PFAS do not appear to confer an essential function to these products and presence leads to direct human exposure to PFAS.

Decision of major retailers/brands to phase-out PFAS indicates that alternatives have been readily available.

**Category 1 – non-essential**



PFAS in leisure clothing for water repellency.

PFAS in certain applications, such as polytetrafluoroethylene (PTFE) breathable membranes appear to be essential for water repellency.

Alternatives to PFAS are available (and on the market), including waxes, silicones, and hydrocarbons.

**Category 2 – substitutable**





PFAS in protective clothing for certain types of health care activities and for firefighter turn-out gear appears to be essential.

## Category 3 – essential

However, R&D is warranted to identify safer alternatives to PFASs in these applications.

Non-stick cookware coated with PTFE.  
PTFE is “inert” in products.

Another consideration of PTFE



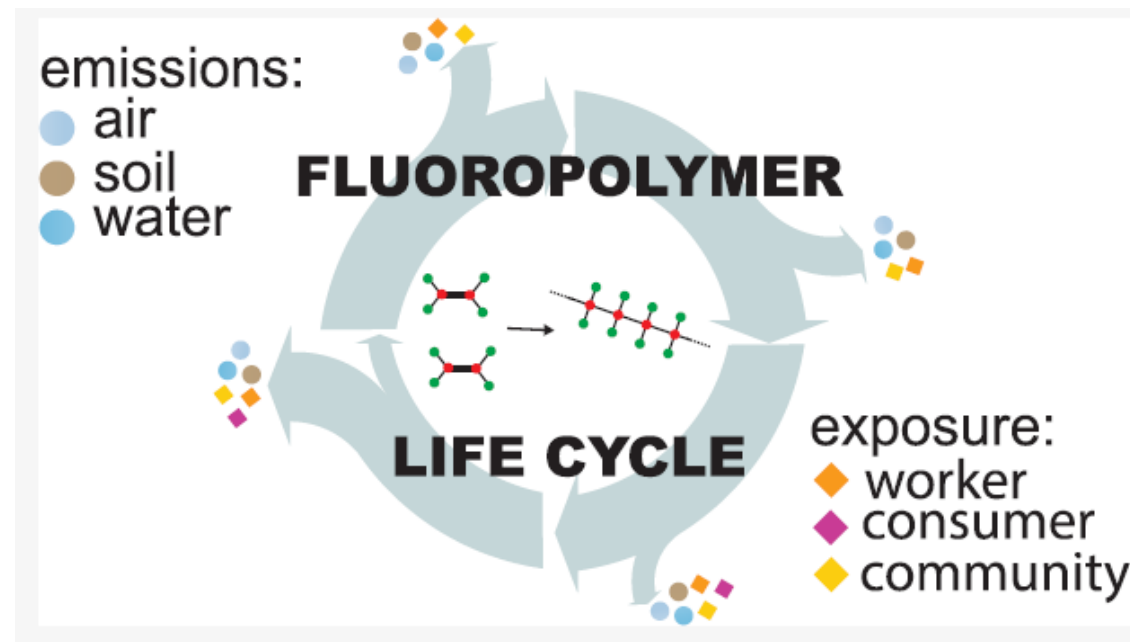
- PTFE is not inert when being produced:
- Other PFAS are released during manufacture, including PFOA (i.e., in China) and GenX (a PFOA replacement used in manufacturing).
  - What happens when product has reached end-of-life?

**A lifecycle perspective is  
needed for the class of PFAS.**

A closed loop process with zero discharge is a great step toward reducing the environmental and human health burden of PFAS...but is it feasible?

Questions of **essentiality** should also be considered, especially when the **lifecycle** of PFAS becomes part of the equation.

In general, production of **persistent chemicals** is always a bad idea.





# Finding essentiality feasible

## 3 aspects:

- 1) What is the function that the substance of concern in the use case,
- 2) Is function necessary for health and safety and critical for the functioning of society, and
- 3) If the function is necessary, whether there are viable alternatives for the chemical for this particular use.

(function could be “chemical function”, “end-use function”, and “service function”)

## Non-essential:

- Aspect 2 is determined to be negative, or
- Aspects 2 and 3 are determined to be positive.
- 3-step procedure follows “functional substitution”.

Environmental  
Science  
Processes & Impacts



CRITICAL REVIEW

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Cite this: DOI: 10.1039/d1em00180a

**Finding essentiality feasible: common questions and misinterpretations concerning the “essential-use” concept**

Ian T. Cousins,<sup>a</sup> Jamie C. De Witt,<sup>b</sup> Juliane Glüge,<sup>c</sup> Gretta Goldenman,<sup>d</sup> Dorte Herzke,<sup>e</sup> Rainer Lohmann,<sup>f</sup> Mark Miller,<sup>g</sup> Carla A. Ng,<sup>h</sup> Sharyle Patton,<sup>i</sup> Martin Scheringer,<sup>j</sup> Xenia Trier<sup>k</sup> and Zhanyun Wang<sup>l</sup>



PAPER

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## An overview of the uses of per- and polyfluoroalkyl substances (PFAS)<sup>†</sup>

Cite this: *Environ. Sci.: Processes Impacts*, 2020, 22, 2345

Juliane Glüge,<sup>Ⓛ</sup>\*<sup>a</sup> Martin Scheringer,<sup>Ⓛ</sup><sup>a</sup> Ian T. Cousins,<sup>Ⓛ</sup><sup>b</sup> Jamie C. DeWitt,<sup>c</sup> Gretta Goldenman,<sup>d</sup> Dorte Herzke,<sup>Ⓛ</sup><sup>e</sup><sup>f</sup> Rainer Lohmann,<sup>Ⓛ</sup><sup>g</sup> Carla A. Ng,<sup>Ⓛ</sup><sup>h</sup> Xenia Trier<sup>i</sup> and Zhanyun Wang<sup>j</sup>

### Industry branches

Aerospace (7)	Mining (3)
Biotechnology (2)	Nuclear industry
Building and construction (5)	Oil & gas industry (7)
Chemical industry (8)	Pharmaceutical industry
Electroless plating	Photographic industry (2)
Electroplating (2)	Production of plastic and rubber (7)
Electronic industry (5)	Semiconductor industry (12)
Energy sector (10)	Textile production (2)
Food production industry	Watchmaking industry
Machinery and equipment	Wood industry (3)
Manufacture of metal products (6)	

### Other use categories

Aerosol propellants	Metallic and ceramic surfaces
Air conditioning	Music instruments (3)
Antifoaming agent	Optical devices (3)
Ammunition	Paper and packaging (2)
Apparel	Particle physics
Automotive (12)	Personal care products
Cleaning compositions (6)	Pesticides (2)
Coatings, paints and varnishes (3)	Pharmaceuticals (2)
Conservation of books and manuscripts	Pipes, pumps, fittings and liners
Cook- and bakeware	Plastic, rubber and resins (4)
Dispersions	Printing (4)
Electronic devices (7)	Refrigerant systems
Fingerprint development	Sealants and adhesives (2)
Fire-fighting foam (5)	Soldering (2)
Flame retardants	Soil remediation
Floor covering including carpets and floor polish (4)	Sport article (7)
Glass (3)	Stone, concrete and tile
Household applications	Textile and upholstery (2)
Laboratory supplies, equipment and instrumentation (4)	Tracing and tagging (5)
Leather (4)	Water and effluent treatment
Lubricants and greases (2)	Wire and cable insulation, gaskets and hoses
Medical utensils (14)	

# The top 10 PFAS

## Substance

Ammonium perfluorooctanoate

Potassium perfluorooctane sulfonate

Potassium *N*-ethyl perfluorooctane sulfonamidoacetate

1-Propanaminium, 3-[[[1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptafluorooctyl)sulfonyl]amino]-*N,N,N*-trimethyl-, iodide (1 : 1)

1-Propanaminium, 3-[[[1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,9-heptafluorooctyl)sulfonyl]amino]-*N,N,N*-trimethyl-, chloride

Oxirane, 2-[[[3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl)oxy]methyl]-1*H*-Pentafluoroethane

Pentane, 1,1,1,2,2,3,4,5,5,5-decafluoro-

Methyl perfluoropropyl ether

Methyl perfluorobutyl ether

Methyl perfluoroisobutyl ether

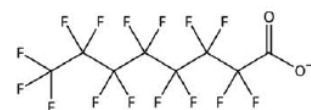
Ethyl perfluorobutyl ether

Poly(oxy-1,2-ethanediyl),  $\alpha$ -[2-[ethyl[(1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptafluorooctyl)sulfonyl]amino]ethyl]- $\omega$ -hydroxy-

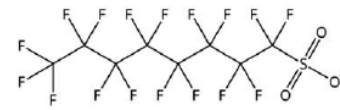
Polytetrafluoroethylene (PTFE)

Poly(vinylidene fluoride) (PVDF)

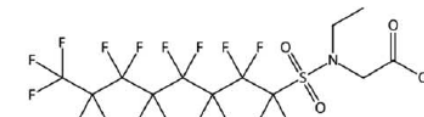
Ethylene tetrafluoroethylene copolymer (ETFE)



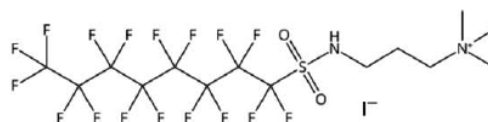
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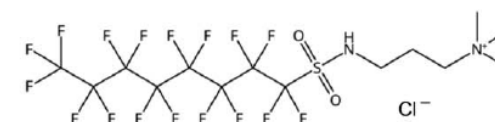
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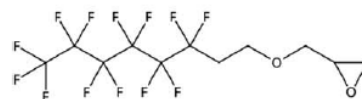
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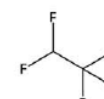
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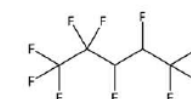
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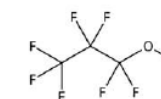
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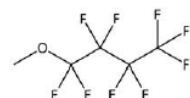
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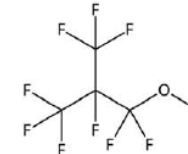
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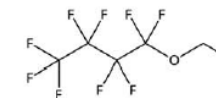
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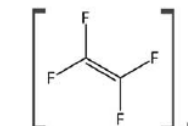
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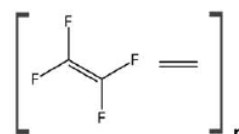
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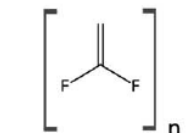
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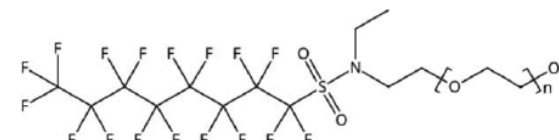
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CAS No. 25-038-71-5



CAS No. 24937-79-9



CAS No. 29117-08-6

# What is the status of efforts to supplant the use of PFAS?

It depends

- Consumer pressure (textiles, cosmetics, furniture)
- Manufacturers' action (carpets)
- Legislation (food contact materials, AFFF)
- Litigation

<https://pfascentral.org/pfas-free-products/>



# Where has essentiality caught on?

- EU:

In October 2020, the European Commission published the Chemicals Strategy for Sustainability. Among its many actions, it includes **phasing out the use of PFAS in the EU, unless their use is essential** and initiatives to reduce their emissions using all available legislative and non-legislative tools.

🕒 This article is more than **8 months old**

## Maine bans toxic 'forever chemicals' under groundbreaking new law

**State is the first to enact a broad ban of PFAS compounds, which are found in everything from cosmetics to cookware**



# Arguably, in several other states, too

- By piecemeal, though..
- Action on PFAS in cosmetics, carpets, food contact materials.
- Might be simply expanded to all consumer products where PFAS are deliberately added to the final product, rather than as part of the manufacturing process.

Thanks, again

- NIEHS, of course
- Global PFAS Science Pane;
- Partners/collaborators, grad students

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THE  
UNIVERSITY  
OF RHODE ISLAND



SCHOOL OF PUBLIC HEALTH  
Department of Environmental Health



STEEP is funded under award number P42ES027706.  
More information about STEEP is available at: [www.uri.edu/steep/](http://www.uri.edu/steep/)



*Thank you.*

**Questions?**

# Substitutions?

category	PFAS use essential	Substitutes available	Status
textiles	No *	yes	some progress
medical equipment	Yes	Maybe	Little
solar panels	unsure	unsure	Little
construction materials	Probably not	Probably yes	Little progress
household products	No	yes	some progress
firefighting	No *	yes	Major progress