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Please see attached comments from Pew Charitable Trusts.

September 17, 2026

Submitted via <https://nmed.commentinput.com/?id=x2khCUR9pK>

The Honorable Secretary Kenney
New Mexico Environment Department
PO Box 5469
Santa Fe, NM 8502-5469

RE: House Joint Memorial 3

Dear Secretary Kenney:

New Mexico has made laudable efforts to protect its citizens from PFAS exposure through legislative, regulatory, and other policy solutions. The Pew Charitable Trusts (Pew) is pleased to provide comments on priority topics for the New Mexico Environment Department's (NMED) report to the New Mexico Legislature on the Per- and Poly-Fluoroalkyl Substances Protection Act,¹ as directed by House Joint Memorial 3; in particular, to inform NMED recommendations to the legislature on the public health, environmental, and economic risks created by specific exemptions in the Act.

Pew is a non-profit, nonpartisan research and policy organization dedicated to informing the public, improving public policy, and invigorating civic life with several initiatives related to the health and well-being of American communities, including Pew's safer chemicals project. Through this project, Pew works to reduce Americans' exposures to endocrine-disrupting chemicals (EDCs) by engaging collaboratively with the private sector and regulatory processes at state and local levels and by bringing new and existing evidence to inform policymaking.

Virtually all Americans—at least 99%—have detectable levels of PFAS in their blood.² A national survey conducted by Pew and global market research and public opinion firm Ipsos found that more than 70% of adults in the United States are very or somewhat concerned about their own or their loved ones' exposures to harmful chemicals in food and drinking water, and a majority are also concerned about chemicals in food packaging, children's and baby products, farmland,

¹ NM Stat § 74-15-3 (2025).

² J. C. Botelho et al., "Per- and Polyfluoroalkyl Substances (PFAS) Exposure in the U.S. Population: NHANES 1999-March 2020," no. 1096-0953 (Electronic).

and other sources. Further, a substantial majority, about 5 in 6, want government and business to do more to ensure chemical safety and increase transparency around the use of chemicals.³

Summary

Pew recommends that due to the potential health risks associated with PFAS exposure, including through the lifecycle of fluoropolymers, the following considerations are included in the NMED report to the legislature:

- Endocrine disruption is a critical health endpoint to consider when assessing and addressing the efficacy of measures to limit PFAS exposure.
- Scientific evidence demonstrates that fluoropolymers, currently exempted under the provisions of the Per- and Poly-Fluoroalkyl Substances Protection Act, can contribute to negative health and environmental impacts across their lifecycle.
- The current exemption of fluoropolymers from New Mexico regulation offers less protection than regulatory approaches used in several other states, and the report should identify options for addressing this gap and for harmonizing the approach with other states.

NMED should consider endocrine disruption and health impacts of PFAS exposure

One way PFAS can harm human health is by interfering with the endocrine system—a complex network of glands and organs that make and release hormones that are essential for biological functions, including growth, development, metabolism, mood, sleep, and reproduction. PFAS are just one class of chemicals that behave in this manner.⁴

³ J. McPartland, “Americans Are Concerned About Harmful Chemicals in Food, Water and Everyday Products,” news release, February 26, <https://www.pew.org/en/research-and-analysis/articles/2026/02/26/americans-are-concerned-about-harmful-chemicals-in-food-water-and-everyday-products>.

⁴ J. McPartland, “PFAS Pose a Serious Threat to Human Health,” *The Pew Charitable Trusts* July 24, 2026, <https://www.pew.org/en/research-and-analysis/fact-sheets/2026/07/PFAS-pose-a-serious-threat-to-human-health>.

PFAS are a broad class of thousands of chemicals for which existing scientific evidence has identified major concerns for public health. Key stakeholders, including researchers and public health organizations, recommend class-based approaches to PFAS management, which have been implemented in some states.^{5, 6, 7} Exposures to various PFAS have been linked to serious health risks, including impacts on reproduction and development in males and females, thyroid disruption, suppression of the immune system, increased cancer risk, and metabolic disruption with multiple outcomes likely mediated through endocrine-related mechanisms.⁸ Many of these health effects occur at low levels of exposure experienced by the general population. While exposure to PFAS during adulthood has been associated with adverse health effects (e.g., increased total cholesterol), exposure during sensitive windows of development may cause long-lasting health impacts, particularly for reproductive and developmental outcomes, in some cases across multiple generations. Such outcomes include reduced fertility in both males and females, adverse pregnancy and birth outcomes such as preeclampsia, pre-term birth, and low birth weight, and post-pregnancy related effects, including impacts to breast feeding duration, and growth and development during childhood and later in life.^{9, 10, 11, 12, 13} PFAS have been detected in cord blood samples, placental tissue, and breast milk, indicating clear exposure

⁵ Cf Auid-Orcid Kwiatkowski et al., “Scientific Basis for Managing PFAS as a Chemical Class,” no. 2328-8930 (Print).

⁶ S. A. Bălan et al., “Regulating PFAS as a Chemical Class under the California Safer Consumer Products Program,” no. 1552-9924 (Electronic).

⁷ Ian T. Cousins et al., “The High Persistence of PFAS Is Sufficient for Their Management as a Chemical Class,” *Environmental Science: Processes & Impacts* 22, no. 12 (2020): 2307-12, <https://doi.org/10.1039/d0em00355g>.

⁸ S. E. Fenton et al., “Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research,” *Environmental toxicology and chemistry* 40, no. 3 (2021): 606-30, <https://doi.org/10.1002/etc.4890>.

⁹ B. P. Rickard, I. Rizvi, and S. E. Fenton, “Per- and Poly-Fluoroalkyl Substances (PFAS) and Female Reproductive Outcomes: PFAS Elimination, Endocrine-Mediated Effects, and Disease,” no. 1879-3185 (Electronic).

¹⁰ Pheruza Tarapore and Bin Ouyang. “Perfluoroalkyl Chemicals and Male Reproductive Health: Do PFOA and PFOS Increase Risk for Male Infertility?” In *International journal of environmental research and public health*, 3794, 2021.

¹¹ Ling Liu et al., “Per- and Polyfluoroalkyl Substances Exposure from Preconception to Lactation: Implications for Female Fertility, Pregnancy Complications, and Birth Outcomes: A Narrative Review,” *F&S Reviews* 7, no. 1 (2026): 100102, <https://www.sciencedirect.com/science/article/pii/S2666571926000034>.

¹² John T. Szilagyi, Vennela Avula, and Rebecca C. Fry, “Perfluoroalkyl Substances (PFAS) and Their Effects on the Placenta, Pregnancy, and Child Development: A Potential Mechanistic Role for Placental Peroxisome Proliferator–Activated Receptors (Ppars),” *Current environmental health reports* 7, no. 3 (2020): 222-30, <https://doi.org/10.1007/s40572-020-00279-0>.

¹³ Yasmyn E Winstanley et al., “Perfluoroalkyl and polyfluoroalkyl substances (PFAS) in trace levels via drinking water diminishes mouse embryo mitochondria function across three generations.” *Environ Res.* 1, no. 296 (2026):124043. <https://doi.org/10.1016/j.envres.2026.124043>.

during sensitive windows of development.^{14, 15} Additionally, the high persistence of these chemicals means their presence in the environment, and their resulting impact on human health, will last for decades.

Given the size of the PFAS class, their ubiquity, and persistence, most people are likely exposed to a combination of PFAS occurring through various exposure pathways (e.g., contaminated land, air, and water including drinking water; food; PFAS-containing products across the product lifecycle).^{16, 17} These combined exposures may result in greater or different health risks than would occur at lower or similar levels of exposure to individual PFAS due to the possibility of additive effects.^{18, 19, 20} In New Mexico, co-occurrence of numerous PFAS, including PFBA, PFPeA, PFHxA, PFHpA, PFOA, PFNA, PFDA, PFOS and PFOSA has been detected in surface water, drinking water, and wastewater, with higher levels near urban areas.^{21, 22}

¹⁴ M. Appel et al., “The Transplacental Transfer Efficiency of Per- and Polyfluoroalkyl Substances (PFAS): A First Meta-Analysis,” *Journal of Toxicology and Environmental Health, Part B* 25, no. 1 (2022): 23-42, <https://doi.org/10.1080/10937404.2021.2009946>.

¹⁵ N. González, J. L. Domingo, “PFC/PFAS Concentrations in Human Milk and Infant Exposure through Lactation: A Comprehensive Review of the Scientific Literature,” no. 1432-0738 (Electronic).

¹⁶ E. M. Sunderland et al., “A Review of the Pathways of Human Exposure to Poly- and Perfluoroalkyl Substances (PFASs) and Present Understanding of Health Effects,” *Journal of Exposure Science & Environmental Epidemiology* 29, no. 2 (2019): 131-47, <https://doi.org/10.1038/s41370-018-0094-1>.

¹⁷ A. O. De Silva et al., “PFAS Exposure Pathways for Humans and Wildlife: A Synthesis of Current Knowledge and Key Gaps in Understanding,” *Environmental toxicology and chemistry* 40, no. 3 (2021): 631-57, <https://doi.org/10.1002/etc.4935>.

¹⁸ K. M. Ríos-Bonilla et al., “Neurotoxic Effects of Mixtures of Perfluoroalkyl Substances (PFAS) at Environmental and Human Blood Concentrations,” *Environmental Science & Technology* 58, no. 38 (2024): 16774-84, <https://doi.org/10.1021/acs.est.4c06017>.

¹⁹ G. C. Addicks et al., “Per- and Polyfluoroalkyl Substances (PFAS) in Mixtures Show Additive Effects on Transcriptomic Points of Departure in Human Liver Spheroids,” *Toxicological Sciences* 194, no. 1 (2023): 38-52, <https://doi.org/10.1093/toxsci/kfad044>.

²⁰ J. M. Conley et al., “Cumulative Maternal and Neonatal Effects of Combined Exposure to a Mixture of Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) during Pregnancy in the Sprague Dawley Rat,” *Environment International* 170 (2022): 107631, <https://www.sciencedirect.com/science/article/pii/S016041202200558X>.

²¹ K. R. Beisner et al., “Temporal Variability and Sources of PFAS in the Rio Grande, New Mexico through an Arid Urban Area Using Multiple Tracers and High-Frequency Sampling,” *Emerging Contaminants* 10, no. 3 (2024): 100314, <https://www.sciencedirect.com/science/article/pii/S2405665024000155>.

²² “State PFAS Study: PFAS Drinking Water Rule – Initial Monitoring Requirement,” New Mexico Environment Department, <https://www.env.nm.gov/PFAS/state-PFAS-study/>.

As NMED evaluates the efficacy of its implementation of the Per- and Poly-Fluoroalkyl Substances Protection Act, including the fluoropolymer exemption, Pew encourages NMED to consider the suite of health effects, specifically endocrine disruption, associated with PFAS exposure, including fluoropolymers, as well as the potential for co-exposures.

NMED should consider the health impacts of fluoropolymers across their production and end-of-use lifecycle

House Joint Memorial 3 states that “additional health and environmental studies are needed to understand more fully the toxicological profiles, exposure risks and public health implications of fluoropolymers.”²³ Reviews of the existing literature indicate that when considering the full lifecycle of fluoropolymers from production to disposal, their use leads to environmental contamination and exposure to the polymers themselves, PFAS degradation products, as well as PFAS used to make fluoropolymers, some of which are PFAS with known health harms.^{24, 25}

Historically, fluoropolymer production in the United States utilized long-chain PFAS, such as PFOA, as processing aids, leading to contamination in the environment and detectable levels in drinking water for communities located near production facilities.^{26, 27} Upon the phase-out of PFOA and other long-chain PFAS in the United States²⁸, replacement PFAS, such as HFPO-DA, also known as GenX, similarly contaminated drinking water in communities near production facilities, and toxicological investigations in animal studies revealed both similar and distinct health impact concerns, including low birth weight, harm to maternal and fetal livers, and

²³ New Mexico Legislature, House Joint Memorial 3: Requesting That the Environmental Improvement Board and the Department of Environment Provide a Report on the Implementation of the Per- and Poly-Fluoroalkyl Substances Protection Act and Recommendations to Improve Consumer Protections from Per- and Polyfluoroalkyl Substances., HJM003 (2026), <https://www.nmlegis.gov/Sessions/26%20Regular/memorials/house/HJM003.html>.

²⁴ R. Auid-Orcid Lohmann et al., “Are Fluoropolymers Really of Low Concern for Human and Environmental Health and Separate from Other PFAS?,” no. 1520-5851 (Electronic).

²⁵ OECD (2025), *Synthesis report on understanding fluoropolymers and their life cycle*, OECD Series on Risk Management of Chemicals, OECD Publishing, Paris, <https://doi.org/10.1787/35b035df-en>.

²⁶ K. Prevedouros et al., “Sources, Fate and Transport of Perfluorocarboxylates,” *Chem Inform* 37, no. 11 (2006): <https://doi.org/10.1002/chin.200611255>.

²⁷ A. Miller et al., “Global Inventory of Fluoropolymer Production Plants and Their Associated PFAS Environmental Contamination,” *ChemRxiv* 2025, no. 1211 <https://doi.org/10.26434/chemrxiv-2025-mrl6b>.

²⁸ “Fact Sheet: 2010/2015 PFOA Stewardship Program,” EPA, February 26, 2026, <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/fact-sheet-20102015-pfoa-stewardship-program>.

placental abnormalities.^{29, 30, 31, 32} A study published in 2026 found that fluoropolymer production plants globally, including some in the United States, emit PFAS that contaminate surrounding air, water, soil, plants, animals, and people. Specifically, the study found 236 distinct PFAS, including PFAS with known health harms like PFOA and GenX, as well as numerous PFAS for which limited or no toxicity data is available.³³

PFAS exposure concerns associated with fluoropolymers extend beyond production. PFAS impurities, residuals, and byproducts may be present in or leach from fluoropolymer-containing finished products, while fluoropolymer disposal and degradation can also generate PFAS.^{34, 35} For example, an analysis of PFAS from tubing used in laboratory equipment found numerous PFAS could leach from both fluoropolymer and non-fluoropolymer materials, with distinct PFAS associated with different types of tubing material.³⁶

Microplastics created from fluoropolymers have also raised concerns for health risks posed by fluoropolymers. For example, emerging evidence suggests that certain cookware coated with the fluoropolymer polytetrafluoroethylene (PTFE) can release PTFE microplastics—even under

²⁹ A. Cordner et al., “Regrettable for Whom? Genx Chemicals as a Case Study in Detrimental Chemical Substitution,” *Environmental Science & Policy* 174 (2025): 104262, <https://www.sciencedirect.com/science/article/pii/S1462901125002783>.

³⁰ B. E. Blake et al., “Transcriptional Pathways Linked to Fetal and Maternal Hepatic Dysfunction Caused by Gestational Exposure to Perfluorooctanoic Acid (PFOA) or Hexafluoropropylene Oxide-Dimer Acid (Hfpo-Da or Genx) in Cd-1 Mice,” *Ecotoxicology and Environmental Safety* 248 (2022): 114314, <https://www.sciencedirect.com/science/article/pii/S014765132201154X>.

³¹ B. E. Blake et al., “Evaluation of Maternal, Embryo, and Placental Effects in Cd-1 Mice Following Gestational Exposure to Perfluorooctanoic Acid (PFOA) or Hexafluoropropylene Oxide Dimer Acid (Hfpo-Da or Genx),” no. 1552-9924 (Electronic).

³² J. M. Conley et al., “Cumulative Maternal and Neonatal Effects of Combined Exposure to a Mixture of Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (Pfos) during Pregnancy in the Sprague-Dawley Rat,” *Environment International* 170 (2022): 107631, <https://www.sciencedirect.com/science/article/pii/S016041202200558X>.

³³ A. Miller et al., “Global Inventory of Fluoropolymer Production Plants and Their Associated PFAS Environmental Contamination,” *ChemRxiv* 2025, no. 1211 <https://doi.org/10.26434/chemrxiv-2025-mrl6b>.

³⁴ R. Auid-Orcid Lohmann et al., “Are Fluoropolymers Really of Low Concern for Human and Environmental Health and Separate from Other PFAS?,” no. 1520-5851 (Electronic).

³⁵ OECD Series on Risk Management of Chemicals, “Synthesis Report on Understanding Fluoropolymers and Their Life Cycle,” OECD, 2025, <https://doi.org/10.1787/35b035df-en>.

³⁶ S. Joudan et al., “Aqueous Leaching of Ultrashort-Chain PFAS from (Fluoro)Polymers: Targeted and Nontargeted Analysis,” *Environmental Science & Technology Letters* 11, no. 3 (2024): 237-42, <https://doi.org/10.1021/acs.estlett.3c00797>.

normal use conditions.³⁷ PTFE microplastics have been detected in several types of media, including human tissues, wildlife, water and sediment.³⁸ Evidence shows that PTFE microplastics induce oxidative stress and inflammation in human cells,³⁹ can have negative impacts on sperm production and quality in mice, and delay oocyte maturation in mouse derived cells.^{40, 41}

While additional research is needed to better understand the full scope of potential health risks of fluoropolymers, existing evidence clearly identifies concerns. Earlier considerations of risks associated with fluoropolymers may not have captured the full range of these potential problems, and when considering the efficacy of the exemptions for this class of chemicals, the report should be certain to lay out the potential implications of risks associated with the full lifecycle of fluoropolymer products. Pew believes that a consideration of this full range of risks - both the risks from the associated PFAS and PFAS degradation products and from the fluoropolymers themselves -- would lead to a more cautious treatment of these products, potentially withdrawing the exceptions for certain or all products containing fluoropolymers.

³⁷ M. Cole et al., "Microplastic and Ptfе Contamination of Food from Cookware," *Science of the Total Environment* 929 (2024): 172577, <https://www.sciencedirect.com/science/article/pii/S0048969724027232>.

³⁸ M. Alaraby et al., "Polytetrafluoroethylene Microplastic Properties, Pollution, Toxicity and Analysis: A Review," *Environmental Chemistry Letters* 24, no. 1 (2026): 27-59, <https://doi.org/10.1007/s10311-025-01885-w>.

³⁹ P. Bahadur K. C. et al., "Polytetrafluoroethylene Microplastic Particles Mediated Oxidative Stress, Inflammation, and Intracellular Signaling Pathway Alteration in Human Derived Cell Lines," *Science of the Total Environment* 897 (2023): 165295, <https://www.sciencedirect.com/science/article/pii/S0048969723039189>.

⁴⁰ D. Ni et al., "Characterization of Microplastics in Human Follicular Fluid and Assessment of Their Potential Impact on Mouse Oocyte Maturation in Vitro," *Ecotoxicology and Environmental Safety* 291 (2025): 117796, <https://www.sciencedirect.com/science/article/pii/S0147651325001320>.

⁴¹ S. Gan et al., "Therapeutic Repair of Sperm Quality Decline Caused by Polytetrafluoroethylene," *Advanced Science* 12, no. 38 (2025): e05148, <https://doi.org/10.1002/adv.202505148>.

New Mexico should harmonize its approach to fluoropolymers to align with states with substantially similar laws

Exemptions for fluoropolymers are not the norm in states with class-based PFAS regulations such as Maine, Minnesota, and Washington.^{42, 43, 44} For example in Maine and Minnesota, fluoropolymers are within the scope of the class-based frameworks adopted for PFAS regulation.^{45, 46} Pew recommends that NMED include in its report information about other states' approaches to PFAS product bans and transparency requirements that are inclusive of fluoropolymers.

NMED rules promulgated under the Per- and Poly-Fluoroalkyl Substances Protection Act state that evidence of compliance with other states' substantially similar reporting requirements can fulfill compliance obligations in New Mexico.⁴⁷ Industry sources have reported that entries into Minnesota's PFAS Reporting Information System for Manufacturers (PRISM) reporting system can fulfill reporting obligations in New Mexico.⁴⁸

The Safer Products Washington program offers another class-based approach inclusive of fluoropolymers that NMED should evaluate for this review, including considering whether to recommend a periodic review process. Washington's legislature created an iterative framework that empowers the Department of Ecology and the Department of Health to address priority chemical classes of concern in priority product categories to reduce harmful exposures over

⁴² "PFAS in Products," Maine Department of Environmental Protection, April 8, 2026, <https://www.maine.gov/dep/spills/topics/PFAS/PFAS-products/>.

⁴³ Minnesota Legislature, Products Containing PFAS, 116.943 (2025), <https://www.revisor.mn.gov/statutes/cite/116.943#stat.116.943>.

⁴⁴ Safer Products Restrictions and Reporting (Cycle 1.5: PFAS), WAC 173-337, State of Washington Department of Ecology, 2025, <https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/rulemaking/wac-173-337-nov2023>.

⁴⁵ "PFAS in Products," Maine Department of Environmental Protection, April 8, 2026, <https://www.maine.gov/dep/spills/topics/PFAS/PFAS-products/>.

⁴⁶ Minnesota Legislature, Products Containing PFAS, Stat. § 116.943 (2025), <https://www.revisor.mn.gov/statutes/cite/116.943#stat.116.943>.

⁴⁷ NMAC: Environmental Protection, Per- and Poly-Fluoroalkyl Substances in Consumer Products, 20.13.2, New Mexico Environmental Improvement Board, 2026, <https://www.env.nm.gov/opf/wp-content/uploads/sites/13/2026/04/EXHIBIT-A-20.13.2-NMAC-FINAL.pdf>.

⁴⁸ Independent Lubricant Manufacturers Association, "New Mexico Issues Final PFAS Rule," news release, July 9, 2026, <https://ilma.org/new-mexico-issues-final-PFAS-rule/>.

time.⁴⁹ The statute creating the Safer Products Washington program established a five-year regulatory cycle that progresses towards eliminating harmful exposures without new legislation to address each emerging concern.⁵⁰ In this framework fluoropolymers are evaluated along with all other PFAS in priority product categories. Multiple aspects of this policy, including the cyclical regulatory framework to integrate advanced chemistries and research, may be useful for NMED’s consideration.

Currently, Washington classifies PFAS in cookware in its reporting category. Manufacturers must report intentionally added PFAS in cookware and kitchen supplies, allowing the Department of Ecology to gather information on uses and alternatives for future regulatory action.⁵¹ Washington is also considering changes to its policy on cookware at this time and may propose changes to this classification through rulemaking.⁵² More specifically, in a June 16, 2026 presentation, the Department of Ecology stated that it is likely to propose restrictions on PFAS in cookware, a category which commonly contains fluoropolymers.⁵³ Fluoropolymers have not been exempted from product categories where PFAS bans are already in effect in Washington.^{54,55, 56}

⁴⁹ *ibid*

⁵⁰ *ibid*

⁵¹ Safer Products Restrictions and Reporting (Cycle 1.5: PFAS), WAC 173-337, State of Washington Department of Ecology, 2025, <https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/rulemaking/wac-173-337-nov2023>.

⁵² “Safer Products for Washington – Interested Parties Website,” Washington State Department of Ecology, https://www.ezview.wa.gov/site/alias_1962/37555/safer_products_for_washington.aspx.

⁵³ Washington Department of Ecology, “Safer Products for Washington: Alternatives Research Update—June 16, 2026,” Jul 17, 2026, podcast, https://www.youtube.com/watch?v=Fu_2riiYzVo.

⁵⁴ Hazardous Waste and Toxics Reduction Program Washington State Department of Ecology, “Per- and Polyfluoroalkyl Substances Chemical Action Plan,” 2022, <https://apps.ecology.wa.gov/publications/documents/2104048.pdf>.

⁵⁵ “Safer Products for Washington Compliance,” Department of Ecology State of Washington, <https://ecology.wa.gov/waste-toxics/reducing-toxic-chemicals/washingtons-toxics-in-products-laws/safer-products/compliance-and-reporting#restricted>.

⁵⁶ State of Washington, Wac 173-337-110: PFAS, (December 24, 2025), <https://app.leg.wa.gov/WAC/default.aspx?cite=173-337-110>.

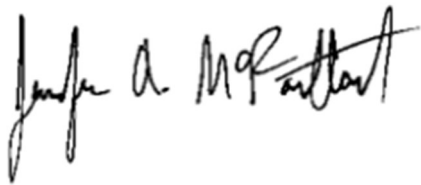
Conclusion

Pew recommends NMED consider how to strengthen the health protective nature of state policies, while continuing to build the evidence base for avoiding harm and transitioning to safer alternatives. Given the evolving scientific evidence that links fluoropolymers with adverse health effects and the experience of other states that have already acted, Pew urges NMED to evaluate the human health benefits that would accrue from the adoption of additional protections from fluoropolymer exposure.

Pew applauds the State and the Department for the work they have done to protect New Mexicans from the harms of PFAS and other contaminants and appreciates the opportunity to provide these comments to support the process.

Please contact me (jmcpartland@pewtrusts.org) or Kyle Kinner (kkinner@pewtrusts.org) in our Government Relations department for additional information or questions.

Sincerely,

A handwritten signature in black ink, reading "Jennifer A. McPartland". The signature is fluid and cursive, with the first name "Jennifer" and last name "McPartland" clearly legible.

Jennifer McPartland
Director, Safer Chemicals
The Pew Charitable Trusts