



February 16, 2022

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue  
Washington, DC 20250

The Honorable Robert M. Califf, MD, MACC  
Commissioner  
U.S. Food & Drug Administration  
10903 New Hampshire Avenue – W01  
Silver Spring, MD 20993

The Honorable Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Secretary Vilsack, Acting Commissioner Woodcock, and Administrator Regan:

While significant progress has been made in understanding perfluoroalkyl and polyfluoroalkyl substances (PFAS), there is much that still needs to be done. We are writing today to request additional guidance and support related to PFAS in the food supply, as well as to request additional assistance for farms facing challenges from contamination. Your expertise to help address the overall safety of domestically produced and imported foods, including identifying which PFAS compounds are of greatest concern and at what level, is critically needed. All states, including those like Michigan proactively leading the response to PFAS, the food and agriculture industry, and the public would all benefit from having national standards for foods, especially within the context of relative risk and dietary exposure. A clear understanding of both advisory levels from a public health standpoint as well as regulatory response standards related to PFAS are needed.

Additionally, as we learn more about PFAS, historic land applications of contaminated processing waste and biosolids spanning decades has led to concerns about plant uptake, use for crop production, accessibility for grazing, and impacts to wildlife and the environment. Farmers who discover these issues, through no fault of their own, need assistance in the form of more research on plant uptake and remediation, as well as access to resources including income support and funding to transition to alternate forms of production if necessary.

As you may know, the State of Michigan, through the coordinated efforts of the Michigan PFAS Action Response Team (MPART), is committed to a proactive approach to identifying and defining the extent of PFAS contamination in our state. When contamination is discovered, the state, along with our partners in local government, have acted swiftly to protect public health. That partnership, in coordination with the federal government, academia, and other stakeholders, has made the State of Michigan a national leader in addressing PFAS contamination. Our systematic approach has tested statewide municipal, school, and other public water supplies, wastewater treatment plants and legacy sites where firefighting foams were used or where waste, including PFAS-laden biosolids, were land applied.

To ensure we're protecting public health, maintaining public confidence in the safety of our food supply, and providing a level playing field for our agricultural industries, it's clear that national standards for food and related guidance are needed.

Finally, in the absence of EPA guidance or criteria, Michigan has dedicated significant resources to study and understand the presence of PFAS in municipal biosolids and the fields where biosolids may have been land applied. Since 2018, Michigan has proactively worked with municipal facilities to significantly reduce concentrations of PFAS in municipal wastewater and their associated residuals. Recently, Michigan implemented an interim biosolids PFAS strategy which prohibits land application of industrially impacted biosolids and continues source reduction efforts. In particular, we are concerned that there is a potential risk at fields where industrially impacted biosolids containing PFAS were applied in the past to detrimentally affect our agricultural industries and our food supply.

EPA's PFAS Roadmap has indicated that a risk assessment would be completed by Winter of 2024 to evaluate biosolids and the need to set pollutant standards for PFAS under the Clean Water Act. Michigan is requesting that the biosolids risk assessment process be expedited to swiftly allow for the setting of biosolids standards. This effort by EPA to evaluate risks associated with PFAS in biosolids is vital to our efforts to protect public health and our food supply as well as the nation's agricultural industries.

We greatly appreciate our ongoing partnership and look forward to working with you on these critical needs.

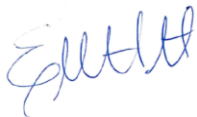
Sincerely,



Gary McDowell, Director  
Michigan Department of Agriculture  
& Rural Development



Liesl Clark, Director  
Michigan Department of  
Environment, Great Lakes & Energy



Elizabeth Hertel, Director  
Michigan Department of Health &  
Human Services

CC: Patrick Breyse, PhD, CIH  
Director  
NCEH/ATSDR  
Centers for Disease Control & Prevention

Abigail Hendershott  
Executive Director  
Michigan PFAS Action Response Team