

U.S. EPA Releases its PFAS Strategic Roadmap

Publications

October 18, 2021

By: Steven Siros

On Monday, October 18, 2021, U.S. EPA released its PFAS Strategic Roadmap (Roadmap) outlining the agency's three-year strategy for addressing per- and polyfluoroalkyl substances (PFAS). The Roadmap acknowledges that U.S. EPA cannot solve the problem of "forever chemicals" by tackling only one route of exposure or one use at a time. Instead, the Roadmap outlines a multi-pronged approach with specific emphasis on the following:

- Accounting for the full lifecycle of PFAS, their unique properties, the ubiquity of their uses, and the multiple pathways for exposure;
- Focusing on preventing PFAS from entering the environment in the first instance which is a foundational step in reducing the exposure and risks of PFAS contamination;
- Holding polluters accountable for releases of PFAS into the environment;
- Investing in scientific research to fill gaps in understanding PFAS to drive science-based decision making; and
- Ensuring that disadvantaged communities have equitable access to solutions.

In order to achieve these objectives, U.S. EPA's Roadmap identifies the following specific agency actions:

- U.S. EPA's Office of Chemical Safety and Pollution Prevention commits to:
 - Publish a national PFAS testing strategy to generate toxicity data on PFAS compounds (Fall 2021);
 - Ensure robust TSCA review for new PFAS chemical submissions (ongoing);
 - Review previous TSCA regulatory decisions to ensure that those decisions were sufficient protective of human health and the environment (ongoing);
 - Enhance PFAS reporting under the Toxics Release Inventory (Spring 2022); and

- Finalize new PFAS reporting under TSCA Section 8 (Winter 2022).
- U.S. EPA's Office of Water commits to:
 - Finalize the Fifth Unregulated Contaminants Monitoring Rule to require testing for 29 PFAS substances (Fall 2021);
 - Establish an MCL for PFOA and PFOS (Fall 2023);
 - Finalize the toxicity assessments for GenX and five additional addition PFAS compounds (Fall 2021);
 - Publish health advisories for GenX and PFBS (Spring 2022);
 - Set Effluent Limitations Guidelines to restrict PFAS discharges nine different industrial categories (2022); and
 - Leverage the National Pollutant Discharge Elimination System (NPDES) program to reduce the discharges of PFAS and obtain more comprehensive information on PFAS discharges (Winter 2022).
- S. EPA's Office of Land and Emergency Management commits to:
 - Designate PFOA and PFOS as CERCLA hazardous substances (Summer 2023);
 - Evaluate designation of other PFAS compounds as CERCLA hazardous substances (Spring 2022); and
 - Issue updated guidance on the destruction of PFAS and PFAS-containing materials (Fall 2023).

In addition to U.S. EPA's Roadmap, the White House announced ongoing efforts by the following seven agencies to address PFAS pollution: the White House Council on Environmental Quality (CEQ), the Departments of Defense, Agriculture, Homeland Security, and Health and Human Services, Food and Drug Administration, and the Federal Aviation Administration. We will continue to track these ongoing efforts to regulate PFAS at the *Corporate Environmental Lawyer* blog.

Related Attorneys



Steven Siros

Partner

ssiros@jenner.com

+1 312 923 2717

© 2026 Jenner & Block LLP. Attorney Advertising. Jenner & Block LLP is an Illinois Limited Liability Partnership including professional corporations. This publication, presentation, or event is not intended to provide legal advice but to provide information on legal matters and/or firm news of interest to our clients and colleagues. Readers or attendees should seek specific legal advice before taking any action with respect to matters mentioned in this publication or at this event. The attorney responsible for this communication is Brent E. Kidwell, Jenner & Block LLP, 353 N. Clark Street, Chicago, IL 60654-3456. Prior results do not guarantee a similar outcome. Jenner & Block London LLP, an affiliate of Jenner & Block LLP, is a limited liability partnership established under the laws of the State of Delaware, USA and is authorised and regulated by the Solicitors Regulation Authority with SRA number 615729. Information regarding the data we collect and the rights you have over your data can be found in our Privacy Notice. For further inquiries, please contact dataprotection@jenner.com.

Stay Informed

