



eBook

The PFAS Handbook

The Ultimate Guide to Identifying & Mitigating
PFAS Risks in Your Supply Chain



Introduction

Perfluoroalkyl and polyfluoroalkyl substances (PFAS), often described as “forever chemicals,” have emerged as one of the hottest compliance topics in recent years.

There is mounting concern over the environmental and health effects of PFAS exposure. The same chemical properties that make PFAS resistant to heat, oil, stains, grease, and water also mean that PFAS do not break down. Instead, they accumulate in the environment and the body, causing negative health effects.

Due to these issues, manufacturers that use PFAS in their products and/or processes face intense scrutiny from lawmakers, consumers, insurers, and litigators. The regulatory landscape around PFAS is rapidly evolving, resulting in a number of business risks, including litigation, consumer and NGO demands, unplanned materials obsolescence, insurer and investor pressure, supply chain disruptions, and new regulatory requirements.

Without a dedicated team to research regulations and update processes, it's difficult to keep up with the latest PFAS requirements. Staying ahead of PFAS risks in your supply chain is costly and difficult when you go it alone, without the right tools or expert support.

This handbook will be your essential guide to understanding your PFAS risks, both regulatory and operational, and how to mitigate them. It provides expert insights on PFAS hot topics, along with resources to help you dive deep into the risks that have the biggest impact on your business.

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Schedule a customized demo with an Assent supply chain sustainability management specialist to see how our platform can streamline your PFAS management.

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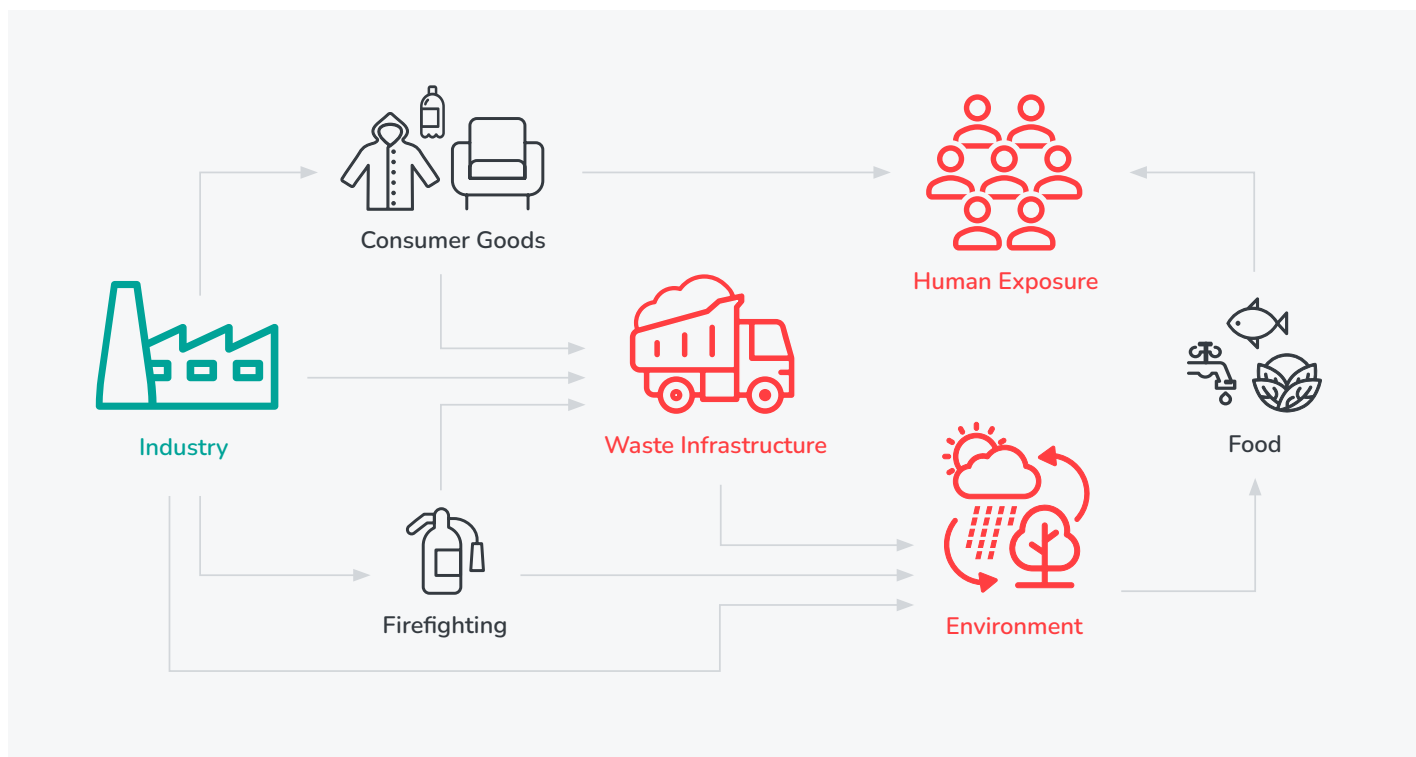
CHAPTER 01

The Problem With PFAS

So why are people so concerned about PFAS?

It's not only because they've been linked to human health issues like thyroid disease, infertility, increased blood cholesterol levels and reduced vaccine response — it's also because PFAS are practically impossible to avoid. In fact, according to national health authorities, approximately 97% of Americans have PFAS in their bloodstreams.¹

¹ Lewis, R.C. et al. (2015, May 29). Serum Biomarkers of Exposure to Perfluoroalkyl Substances in Relation to Serum Testosterone and Measures of Thyroid Function Among Adults and Adolescents. *International Journal of Environmental Research and Public Health*, 12(6): 6098–6114. doi: 10.3390/ijerph120606098



PFAS are commonplace in the manufacturing sector, and this means high exposure rates for consumers. Almost all complex manufactured goods rely on the non-stick, heat resistant, electrical insulating, and water-repelling properties of PFAS. Many modern manufacturing processes, like chrome plating, use PFAS chemicals. And many manufacturers are reliant on PFAS-embedded parts, such as gaskets, hosing, or O-rings, for their maintenance, repair, and operations (MRO). It's no wonder that PFAS make their way into household products, food packaging, soil, and drinking water, creating a burden for public health and safety.

Why Are PFAS Useful?

PFAS chemicals provide many performance advantages across a wide variety of products and materials. Here are some key properties of PFAS:

- ▶ Non-stick
- ▶ Electrical insulation
- ▶ Flame retardant
- ▶ Thermal stability/heat resistance
- ▶ Chemical resistance
- ▶ Water-repellent
- ▶ Anti-fogging
- ▶ Oil- and stain-repellent
- ▶ Ultraviolet resistance

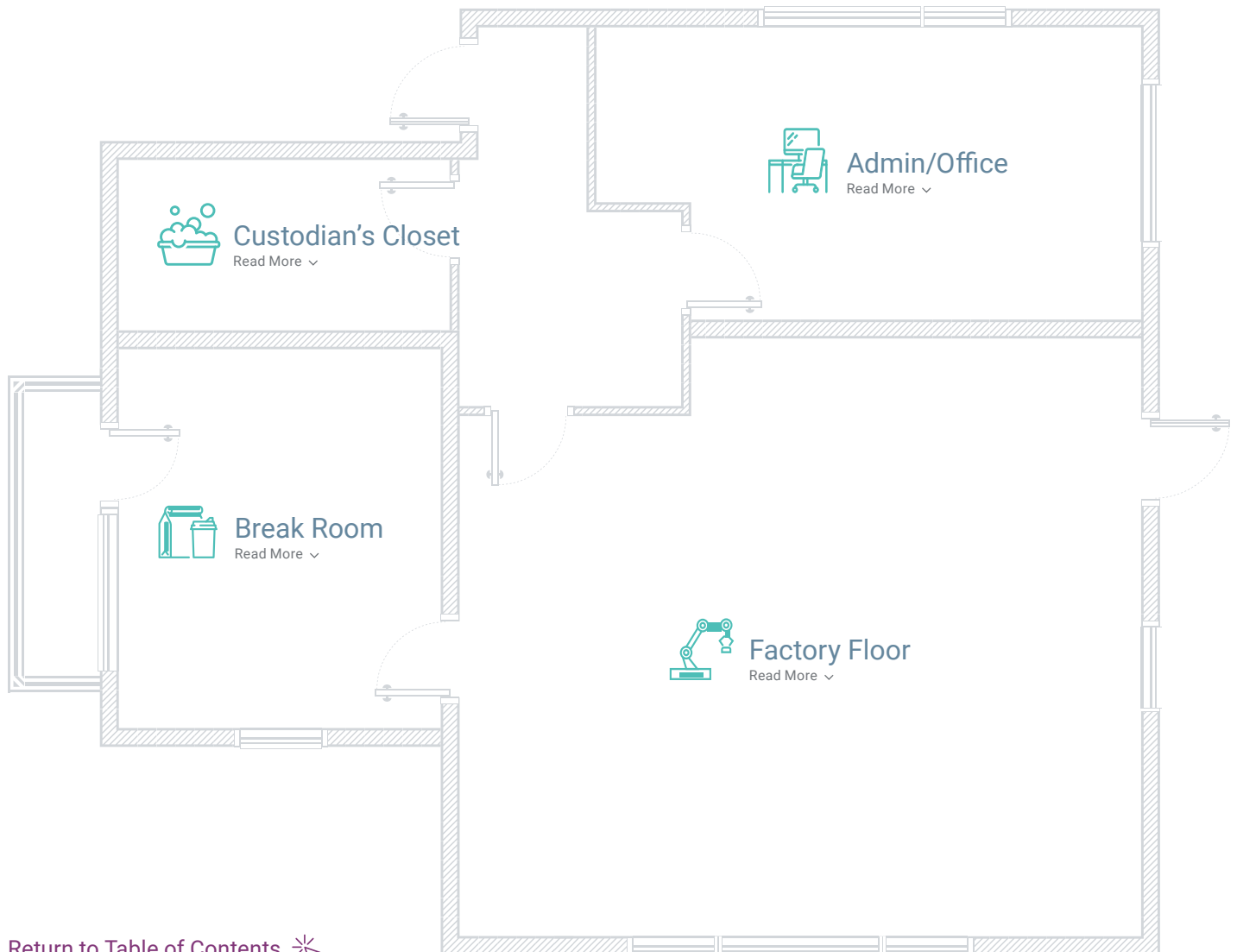
If any of your products or purchased materials have these characteristics, they likely contain PFAS.



Hidden PFAS in Your Facility

A challenge with PFAS is that it's not always clearly communicated or obvious when a product contains them. You likely have PFAS hidden all over your facility, in places you wouldn't expect.

Hover your mouse over the floorplan of our factory to learn which products and processes frequently contain PFAS.



CHAPTER 02

PFAS Regulations Around the Globe

The regulatory landscape for PFAS is complex and rapidly evolving. This can make it difficult for manufacturers to understand their regulatory obligations. There are a number of enacted and proposed regulations globally to keep track of.

This chapter details some of the most pressing PFAS regulations to be aware of and summarizes their requirements for compliance. However, as we'll discuss in the next section of this handbook, regulatory risks are not the only ones that need your immediate attention.



Are You in Scope of PFAS Regulations?

If your products contain PFAS or you use PFAS in your processes, you're likely in scope of one or more of the many global PFAS regulations that exist. Download Assent's *PFAS Scoping Guide* for guidance and a flowchart to help you assess whether you have PFAS hidden in your supply chain.

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PFAS Regulations in the U.S.

The Toxic Substances Control Act

On October 11, 2023, the U.S. Environmental Protection Agency (EPA) published the final PFAS reporting rule under Section 8(a)(7) of the Toxic Substances Control Act (TSCA) in the Federal Register.²

Who's in Scope?

This regulation introduces federal PFAS reporting requirements for businesses that manufacture or import, or have manufactured or imported, PFAS since January 1, 2011. This includes importation of PFAS that have already been incorporated into articles, such as articles containing PFAS as part of surface coatings or included in electrical equipment. There are no de minimis exemptions for small volume importers or small businesses.

For businesses that **only import** PFAS in articles, and for those that manufacture less than 10 kilograms for research purposes, there are streamlined reporting requirements.

² EPA. (2023, October 11). Toxic Substances Control Act Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances. *Federal Register*. <https://www.federalregister.gov/documents/2023/10/11/2023-22094/toxic-substances-control-act-reporting-and-recordkeeping-requirements-for-perfluoroalkyl-and>



Deep Dive Into TSCA Compliance

Keeping up with TSCA requirements as they evolve is key to protecting your U.S. market access and avoiding regulatory noncompliance risks.

The TSCA Handbook: Your Guide to Compliance gives you vital information about managing a proactive TSCA program.

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What's Reported?

Most businesses will need to report company and plant-site information, chemical-specific information (including CASRN identification number), categories of use of the PFAS, concentration or volume of the PFAS (or imported article), and other article data (if applicable).

Rather than providing a list of reportable substances, the EPA has provided a definition of PFAS, and requires reporting on all substances that meet this definition.

To date, by matching this definition against the TSCA Inventory and Low Volume Exemption (LVE) claims, the EPA has identified over 1,462 PFAS chemicals, with approximately half of those on the active inventory (i.e., in U.S. commerce).³ If a substance is being manufactured or imported that, for some reason, isn't already on the TSCA Inventory or using an LVE, it must still be reported if it meets the definition.

What Goes Into a Report?

Under the new TSCA reporting rule, the EPA is requiring businesses to collect and submit a wide range of information about PFAS usage in industry. Some of this data includes:

- ▶ PFAS uses
- ▶ Production volumes
- ▶ Import volumes
- ▶ Disposal
- ▶ Exposures
- ▶ Hazards
- ▶ Toxicity information



³ EPA, (2024, January 25). TSCA Section 8(a)(7) Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances. <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/tsca-section-8a7-reporting-and-recordkeeping>



For a comprehensive list of data types being collected, please refer to the final published rule. Data must be submitted for each year between 2011 and 2022 for each unique PFAS chemical, whether manufactured or imported. All in-scope businesses will need to submit PFAS data using the EPA's Central Data Exchange (CDX) electronic submission system.

What Are the Timelines?

The portal for submitting PFAS data will open on April 13, 2026, with reports due October 13, 2026, giving manufacturers a six-month window to complete their reports.

Small businesses, as defined in 40 CFR 704.3 of the rule, have an additional six months to collect and report their data, with a deadline of April 13, 2027.



Every Minute Matters: Your PFAS Timeline at a Glance

The coming years are vital for staying ahead of your PFAS risks. Download the PFAS Timeline infographic to see a chart of your major milestones and deadlines.

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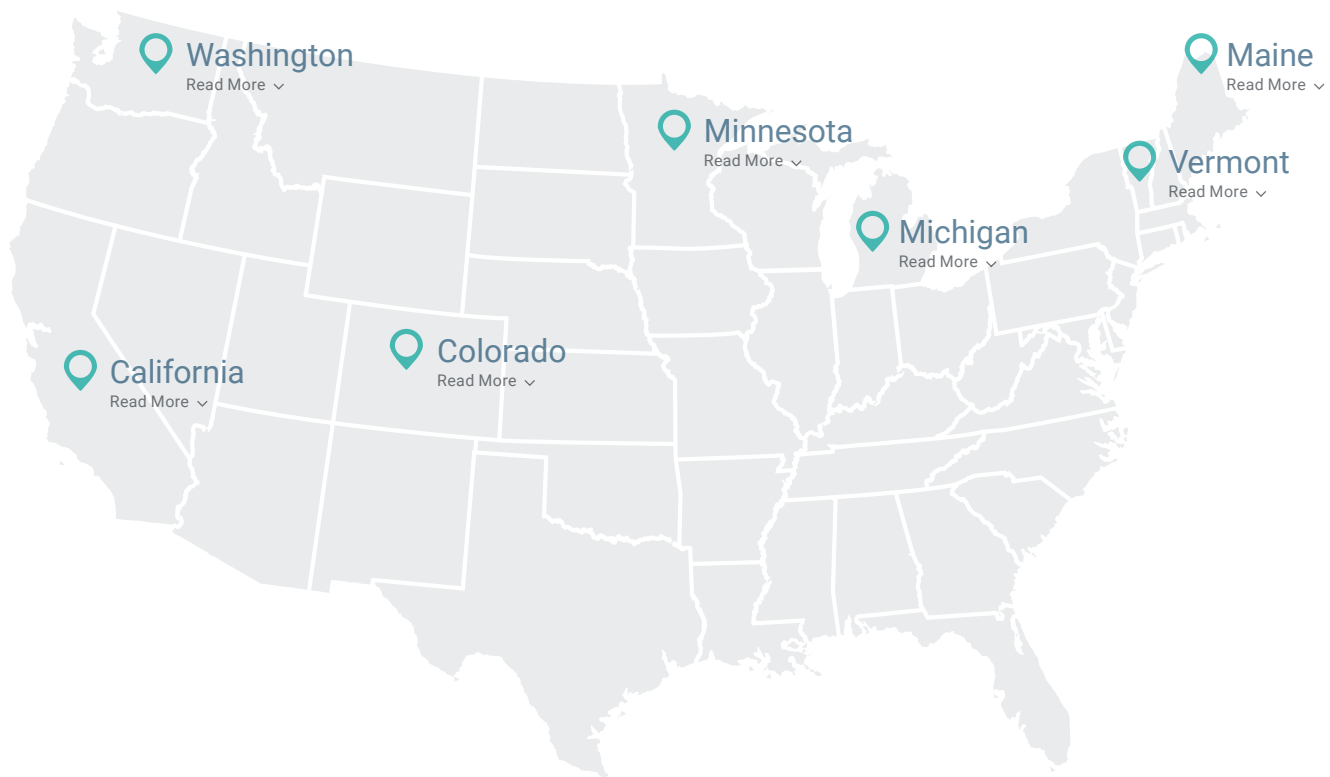


State-Level PFAS Regulations

In addition to TSCA, most U.S. states have their own regulations that affect any business operating in or distributing goods to the market within those states. The state-level regulatory landscape for PFAS is particularly complex, with a large number of proposed regulations that are expected to be finalized in the coming years on top of regulations that are already in effect. These regulations include obligations for reporting and fee payments, notification to customers, or even outright restrictions on certain products or, in some states, all products. There are many nuances from state to state.

Here's a list of some of the most notable state-level PFAS regulations to date.

Hover your mouse over each state to learn more.



Note: Manufacturers should consult with their legal counsel and their state's department of environment for official guidance on their state PFAS requirements. This list does not constitute legal advice and does not cover all requirements.



PFAS Regulations in Canada

The Canadian Environmental Protection Act

On July 27, 2024, the federal government of Canada published a PFAS reporting requirement under the Canadian Environmental Protection Act (CEPA). It requires in-scope businesses to submit a PFAS report detailing substance-level data aggregated across their products, as well as product information (such as product names, PFAS concentrations, and intended use) for the year 2023.



Who's In Scope & What's Reported?

Any business that imports or manufactures PFAS is in scope. However, unlike TSCA, the number of in-scope reportable substances is much smaller — approximately 300 chemicals. Despite having a smaller list of reportable PFAS, it can be more complex to determine which ones need to be reported because CEPA has far broader scoping criteria, including de minimis exclusions by both concentration and total volume.

In addition, reportable PFAS are separated into three lists, and the reporting thresholds are not the same across each one. Certain product categories (like juvenile products and cookware) have lower reporting thresholds than others. There are too many exclusions and scoping conditions to list here, so refer to the official notice in the Canada Gazette to review the complete guidelines.⁴

What Are the Timelines?

The Canadian PFAS reporting rule is notable for having an extremely tight timeline for data collection, analysis, and report submission. With reports due on January 29, 2025, there are only a few months between the publication of the rule and the deadline.

⁴ Department of the Environment, Government of Canada. (2024, July 27). Canada Gazette, Part I, Volume 158, Number 30: SUPPLEMENT. Notice with respect to certain per- and polyfluoroalkyl substances (PFAS). <https://gazette.gc.ca/rp-pr/p1/2024/2024-07-27/html/sup-eng.html>

PFAS Regulations in the EU

There are a number of regulations in the EU that restrict PFAS or require reporting for their use. In many cases, these regulations overlap, creating a complex regulatory landscape for manufacturers to manage.

The key to PFAS compliance for businesses operating in, or distributing goods to, the EU is to carefully monitor whether any materials or articles contain PFAS. This means working closely with suppliers to ensure they aren't providing restricted substances and are properly disclosing reportable substances in their goods. Here are the main regulations in the EU that address PFAS:

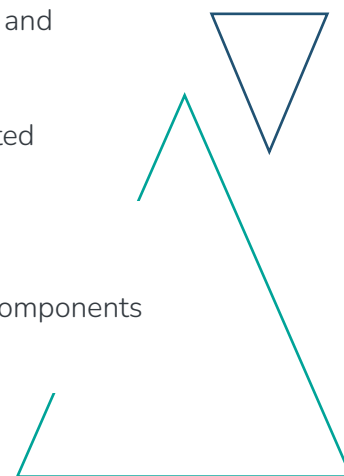
Persistent Organic Pollutants (POPs) Regulation

Persistent organic pollutants (POPs) are hazardous organic chemical compounds that are resistant to biodegradation and have long-term adverse effects on people and the ecosystem. To restrict or reduce the use of POPs, the United Nations Environment Programme adopted the Stockholm Convention on POPs in 2001, and it entered into force in 2004. The POPs Regulation is the EU's implementation of the Stockholm Convention.

Over time, the list of restricted substances has grown to include several PFAS chemicals, including perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA).

To comply with the PFAS restrictions in the international Stockholm Convention and EU POPs Regulation, manufacturers should:

- ▶ Review legislation in markets where their products are produced or imported
- ▶ Survey the supply chain to identify the presence of PFAS
- ▶ Evaluate PFAS alternatives for use in products
- ▶ Redesign materials to eliminate the presence of PFAS in products and/or components
- ▶ Remain aware of updates to existing POPs lists



REACH Regulation

Under REACH Annex XVII (the Restricted Substances List), the EU has imposed restrictions on certain PFAS, such as perfluorocarboxylic acids (C9-14 PFCA), and the list continues to evolve. For example, a proposed restriction on PFAS used in fire-fighting foams is supported by the European Chemicals Agency (ECHA)'s scientific committees.⁵ Additionally, in 2023, a proposal to restrict over 10,000 substances was published, representing a massive update to the Restricted Substances List.⁶

PFAS on the Candidate List of substances of very high concern (SVHCs) may eventually be added to the REACH Authorisation List, meaning that they cannot be used without prior ECHA approval.

A number of PFAS have been identified as SVHCs on the REACH Candidate List.⁷ This means that companies manufacturing, importing, or using the substance in the EU must notify their customers if the substance is present over a specific threshold, and submit this information to the SCIP database. Additionally, they must also notify ECHA if they are placing more than one metric tonne per year on the EU market.

To comply with REACH, manufacturers must carefully monitor ECHA's lists and engage their suppliers to collect detailed information about substances in parts and articles.

⁵ ECHA. (2023, June 22). ECHA's committees: EU-wide PFAS ban in firefighting foams warranted. <https://echa.europa.eu/de/-/echa-s-committees-eu-wide-pfas-ban-in-firefighting-foams-warranted>

⁶ ECHA. (2023, February 7). ECHA publishes PFAS restriction proposal. <https://echa.europa.eu/de/-/echa-publishes-pfas-restriction-proposal>

⁷ ECHA. (n.d.) Candidate List of substances of very high concern for Authorisation. <https://echa.europa.eu/candidate-list-table>





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Expert Guidance for REACH Compliance at Your Fingertips

Learn how to manage SVHCs in your supply chain with Assent's *The REACH Handbook: Your Guide to SVHC Compliance*. You'll get advice on:

- ▶ Running a REACH compliance program
- ▶ Collecting SVHC data from your suppliers
- ▶ Protecting your EU market access

A Complex Regulatory Landscape

In addition to REACH and the POPs Regulation, the EU manages PFAS risks through a number of other regulations and controls, including:

- ▶ The Classification, Labelling, and Packaging (CLP) Regulation
- ▶ The EU Drinking Water Directive
- ▶ Safety thresholds for PFAS in food set by the European Food Safety Authority

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CHAPTER 03

PFAS Risks Are Business Risks

The risks of using PFAS in your products and processes go beyond regulatory compliance. In fact, the non-regulatory impact may pose larger business risks, doing more damage to your bottom line and disrupting operations more severely than regulatory ones.

This section of the handbook details the business risks of using PFAS. It will help you identify your greatest risks so you can formulate a PFAS work plan to reduce your exposure to them (the next section will help you start the planning process).

PFAS Risks

Unplanned Obsolescence
& Product Redesign

Liability

Insurance Issues

Investor Pressure

Brand Risks

Unplanned Obsolescence & Product Redesign

Rising regulatory pressures, mounting lawsuits, and increasing consumer concerns have caused some PFAS manufacturers to cease production of certain goods. For example, 3M announced it would end PFAS manufacturing by the end of 2025.⁸ It has identified 25,000 products that will be discontinued. As they sell to every industry, including automotive, construction, electronics, energy, healthcare, manufacturing, and transportation, this decision will affect thousands of companies across many tiers of the supply chain.

As suppliers phase PFAS out of the supply chain, manufacturers will have difficulty finding the parts they need to create their products or run their processes. This will likely lead to a few risk scenarios:

1. Increased competition for PFAS-free parts. PFAS-reliant materials will become more scarce, prices may rise, and businesses that are reliant on one supplier may face disruption.
2. Losing access to PFAS chemicals and parts may pose a manufacturing challenge to support existing processes, or even the ability to maintain capital equipment. For example, some equipment that relies on a specific type and size of gasket with PFAS that is only produced by 3M may be difficult to maintain.

Where PFAS chemicals are essential to a process (e.g., a chrome plating operation), new chemicals may need to be identified, which could lead to changes in processing equipment.

3. Products may need to be redesigned if a PFAS-reliant part cannot be procured, or if there's no longer market demand for your product if it contains PFAS.

Redesigning a product is an expensive, costly process. Once a product is redesigned, it may have to go through requalification or recertification before national authorities allow it to be sold in their markets (which also adds time and cost).



⁸ 3M. (2022, December 20). 3M to Exit PFAS Manufacturing by the End of 2025. <https://news.3m.com/2022-12-20-3M-to-Exit-PFAS-Manufacturing-by-the-End-of-2025>



Liability

Since 2005, there have been over 6,400 PFAS-related lawsuits.⁹ PFAS manufacturers have been hit the hardest over the last decade. For example, 3M settled a lawsuit in 2023 for \$10.3 billion USD over drinking water lawsuits.¹⁰ And litigation isn't just an American trend — 3M Belgium also settled a €571 million lawsuit to remediate PFAS contamination in Flanders.¹¹ In 2021, DuPont, Chemours, and Corteva, all chemical manufacturers, reached a \$4 billion USD settlement over PFAS contamination claims.¹²

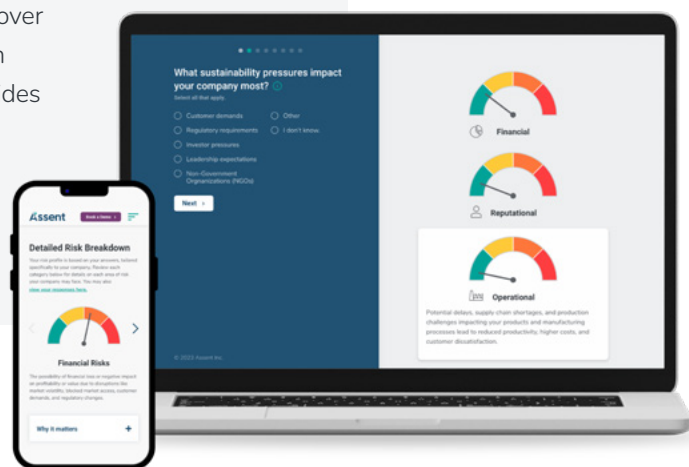
Historically, these lawsuits have targeted chemical manufacturers. However, that trend is shifting; lawsuits are increasingly targeting companies that use PFAS chemicals in their processes, products, or both. Several states are now suing businesses that use PFAS in their final products or processes to hold them accountable for cleaning up contamination.

Class-action lawsuits are also starting to appear against companies that use PFAS in consumer products. Some of these lawsuits directly target companies that make fraudulent claims in corporate sustainability reports or marketing material that products containing PFAS are “sustainable,” “healthy,” or “all-natural.”

Get a Risk Snapshot

Try Assent's online supply chain risk assessment tool to discover the top regulatory risks to your operations and bottom line. In just five minutes, you get a personalized risk report that provides actionable recommendations based on your answers.

Start Your Assessment



9 Wallender, A. (2022, May 23). Companies Face Billions in Damages as PFAS Lawsuits Flood Courts. Bloomberg Law. <https://news.bloomberglaw.com/pfas-project/companies-face-billions-in-damages-as-pfas-lawsuits-flood-courts>

10 Delouya, S. (2023, June 22). 3M agrees to pay \$10.3 billion to settle 'forever chemicals' drinking water lawsuits. CNN Business. <https://www.cnn.com/2023/06/22/business/3m-forever-chemicals-settlement/index.html>

11 Walker, L. (2022, July 6). Flanders reaches agreement with 3M over pollution clean-up. The Brussels Times. <https://www.brusselstimes.com/250529/flanders-reaches-agreement-with-3m-over-pollution-clean-up>

12 DuPont. (2021, January 22). DuPont, Corteva, and Chemours announce resolution of legacy PFAS claims. <https://www.prnewswire.com/news-releases/dupont-corteva-and-chemours-announce-resolution-of-legacy-pfas-claims-301213118.html>

PFAS Lawsuits in the News

Some major manufacturers are making headlines and being taken to court over their use of PFAS, and the number of lawsuits is only going to increase. Here are some recent examples:

- ▶ **Coca-Cola:** Being sued for calling its Simply Tropical fruit juice “natural” despite levels of PFAS hundreds of times above the federal advisory limits for drinking water.¹³
- ▶ **Bolthouse Farms:** Tests revealed that Bolthouse Farms’ Green Goodness smoothie, touted as “100% fruit juice,” contains PFAS at levels far above federal advisory limits. Consumers launched a class-action suit against the beverage manufacturer in February 2023.¹⁴
- ▶ **Thinx:** Settled for up to \$5 million USD after testing revealed the presence of short-chain PFAS in its products, despite claims of being a safe and sustainable choice.¹⁵
- ▶ **Colgate-Palmolive:** Consumers filed a suit in March 2023 after testing showed its Tom’s of Maine “natural” Wicked Fresh! Mouthwash contains multiple PFAS chemicals.¹⁶
- ▶ **Kraft Heinz:** Subject of a lawsuit for deceptive marketing practices because there’s PFAS in its reputedly “all-natural” Capri Sun Strawberry Kiwi juice.¹⁷

13 Joseph Lurenz v. The Coca-Cola Company and The Simply Orange Juice Company. (United States District Court Southern District of New York 2022). <https://www.cmbg3.com/library/Coca-Cola-Fraud-Lawsuit.pdf>

14 Gwendolyn Smith v. WM. Bolthouse Farms Inc. (United States District Court Eastern District of New York 2023). <https://www.classaction.org/media/smith-v-wm-bolthouse-farms-inc.pdf>

15 Treisman, R. (2023, January 19). Thinx settled a lawsuit over chemicals in its period underwear. Here’s what to know. NPR. <https://www.npr.org/2023/01/19/1150023002/thinx-period-underwear-lawsuit-settlement>

16 Abigail Esquibel, Tammy Searle, Jeremy Wahl, Aimen Halim, and Nicholas Salerno v. Colgate-Palmolive Co. and Tom’s of Maine, Inc. (United States District Court Southern District of New York 2023). <https://www.verdantlaw.com/wp-content/uploads/2023/03/Esquibel-et-al.-v.-Colgate-Palmolive-Co-Complaint-1.27.23.pdf>

17 Alexandra Toribio v. Kraft Heinz Company. (United States District Court Northern District of Illinois 2022). <https://www.classaction.org/media/toribio-v-the-kraft-heinz-company.pdf>



Insurance Issues

Insurance companies around the globe are starting to protect themselves from PFAS-related liability costs. Due in part to the growing number and size of lawsuits, and concerns about future claims and legal obligations posed by regulations like the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) — known better as Superfund — many insurers are starting to exclude pollution and PFAS claims from their coverage. Others are now carefully investigating their customers' use of PFAS and evaluating their PFAS risk exposure when they underwrite corporate insurance. In some rarer cases, insurers have proactively sued their policyholders after denying their PFAS-related claims in an effort to get a judge to rule in their favor about excluding PFAS coverage.



Over the next few years, you should expect insurers to:

- ▶ Ask you to provide information about whether or not you use PFAS, now or in the past
- ▶ Hire environmental experts to conduct a forensic review of sites when you purchase site-specific coverage
- ▶ Review their portfolios for industries currently and potentially impacted by PFAS restrictions
- ▶ Develop coverage maps of clients potentially affected by PFAS restrictions
- ▶ Exclude coverage for PFAS-related claims and cleanup
- ▶ Engage in contribution/subrogation actions when there are multiple contributors, causes, or responsible parties

Operating without insurance simply isn't an option, so what can you do to mitigate risks to your insurance? First, you need to know whether you have PFAS in your processes and products, and whether they are in your supply chain. Eliminating PFAS from your operations and parts is the surest way to avoid these insurance risks, but if it's not possible, your next line of defense is having reliable supply chain data. You should be prepared to field inquiries from your insurance providers about your PFAS use and be able to justify whether their use is essential.

Brand Risks

Because consumer concern over PFAS is rising, taking a proactive approach to PFAS management is crucial for protecting your brand and market share. Whether you're selling goods to the general public, or to another business that is facing the same risks, being able to show your product is PFAS-free will help improve public perception of your brand.

As demonstrated by the number of class-action lawsuits, there's significant brand risk if your company is found to be making marketing claims about health or sustainability that don't align with the use of persistent, synthetic substances in your products. If you're manufacturing a product that can't be made without PFAS, it's important that you're being transparent in how to market your goods.

Proactively Managing Your Hidden PFAS Risks

Many manufacturers are unaware of whether PFAS are in their products or plants, and this exposes them significantly to the above-mentioned risks. When you don't know if you use PFAS, you can't take the appropriate steps to reduce the types of risk that will have the biggest impact on your operations and bottom line.

That's why the most vital risk mitigation action you can take is to proactively identify PFAS in your supply chain. Data collected from your suppliers is the foundation for a PFAS risk management strategy, even recognized as a viable approach by regulators like the EPA, so manufacturers should start engaging with their suppliers and assessing their own processes for PFAS.

In the next section of this book, you'll get a proactive work plan that will outline the high-level steps to collecting this data and reducing your risk.

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Understanding Your PFAS Risks

Download our guide, *How to Prepare for PFAS Risks*, for even more information about understanding and protecting your business from PFAS risks. It covers the current regulatory landscape, the most significant risks, and how to start up a PFAS program.

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CHAPTER 04

How to Run a PFAS Risk Identification Program

Identifying PFAS in your supply chain and processes is fundamental to understanding your business risks. But collecting this information from suppliers and product records is not easy if you're going it alone or not following a proven process.

Furthermore, without a way to store and use that information, including analyzing your bills of materials (BOMs) to determine which products are impacted, it may be difficult to maintain records or know where your biggest priorities should be.

To help kickstart your PFAS program, here is a five-step methodology that summarizes the process of identifying PFAS usage and preparing to redesign products and processes to reduce your risk exposure.

5 Steps to PFAS Program Success

STEP 01

Audit Yourself

Start with the data you have immediate access to and assess it for PFAS chemicals. This includes existing procurement and chemical records about substances used in your current processes. Be sure to include MRO processes that are also at a high risk for PFAS, such as electroplating.

STEP 02

Engage Suppliers

Next, survey your suppliers about PFAS in the parts and materials you purchase from them. We recommend sending out a standardized survey to all your suppliers to collect product composition data, including the specific chemicals used, amounts, and their function. You can automate this process by using Assent's supply chain sustainability management platform.

Be cautious when using full material disclosures (FMDs) or safety data sheets (SDSs) for PFAS due diligence — these allow suppliers to omit a certain percentage of substance data (to protect proprietary compositions), so they may not indicate that a PFAS chemical is present. The best source of data is a specific PFAS declaration collected through direct supplier engagement.

In addition, you may need to educate your suppliers and give them time to reach out to their own supply chains to collect accurate PFAS data.





Assent: Your Solution for Supply Chain Sustainability Management

Learn how the Assent supply chain sustainability management solution helps complex manufacturers achieve deeper sustainability across product compliance and ESG with the *Assent Solution Guide*.

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STEP 03

If You Find PFAS, Strategize

Anytime you identify PFAS in a product or process, it's time to evaluate whether you will need to redesign or retire it. To make that decision, you should ask yourself:

- ▶ Will regulations in the markets you serve block product sales?
- ▶ Can your equipment or process work without the PFAS? Is there a PFAS-free alternative that would let you continue the process?
- ▶ Is the part or material slated to become obsolete by the original manufacturer? Can you proactively find a replacement?

If PFAS cannot be removed from your product, assess whether your use of it meets exemption criteria. Otherwise, you should start planning for early product obsolescence.





STEP 04

What to Expect With Redesigns

Redesigning a product to be PFAS-free is a multi-step process that can take months or even years to complete, depending on the number of products and their complexity. Anytime a product gets redesigned, you will also need to requalify those products for each market where they're sold, including getting them recertified by the appropriate regulatory agencies. This also includes updating labels and literature.

STEP 05

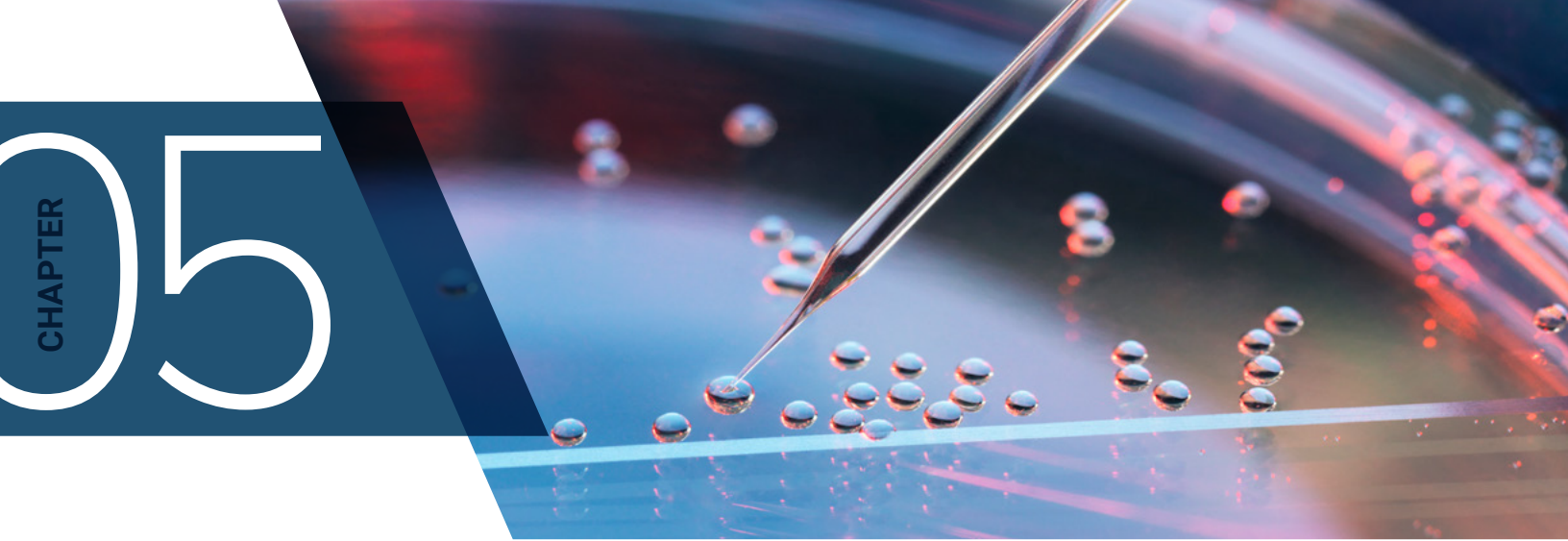
Document Everything

Supply chain data is at the heart of PFAS risk management and reporting, so it's vital you maintain strong due diligence records. Having your supplier declarations and parts data centralized will make it easier for you to generate PFAS usage reports and respond to customer and regulator requests for data.

Assent can help you collect and verify the data you'll need to create PFAS declarations for your customers, insurance providers, and other stakeholders. If you are PFAS-free, or in compliance with applicable product safety regulations, we also recommend you add a declaration into your sustainability report and corporate website.

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CHAPTER 05

The Need for Proactive PFAS Management

Because PFAS regulations and requirements are still rapidly evolving in key markets, your business can't afford to wait before focusing on PFAS management. That's why a proactive approach is vital to keeping ahead of your risks — it will make your business more resilient and competitive in an accelerating regulatory landscape.

This section explains how a proactive PFAS management strategy helps you be more efficient with your company's time and money, and why your team should act now to support a proactive strategy.

Why Proactive PFAS Management?

Proactive PFAS management is all about collecting PFAS usage data in a way that gives you the insights and information to stay ahead of regulations instead of reacting to them. For example, by collecting PFAS data from the source — your supply chain — you can use that data to comply with future regulations in addition to current reporting requirements.

Rather than basing your PFAS data collection on one specific regulation, like TSCA, a proactive program takes a broad approach and surveys suppliers about their total PFAS use. And instead of requiring a new PFAS survey for each regulation, a proactive approach harmonizes all data collection into standardized PFAS questionnaires to reduce supplier fatigue. This also saves you from having to create new surveys or modify existing ones every time a new PFAS rule comes into effect, which you should expect to happen frequently over the next few years. That means a proactive program also includes regularly monitoring the regulatory landscape to understand your requirements well in advance.

But being proactive isn't just about staying ahead of your regulatory obligations. It also has benefits for your business. It helps you:

- ▶ Avoid the disruptions of parts scarcity and unplanned obsolescence so you can maintain sales in key markets
- ▶ Gain a competitive advantage during changes in market conditions by differentiating your goods from your competitors' high-risk products
- ▶ Respond to customer data requests more quickly, reducing the strain on your team and improving your reputation with buyers
- ▶ Improve relationships with suppliers by reducing survey fatigue
- ▶ Reduce the overall effort and cost of running a product compliance program, saving money by introducing efficiencies you miss while being reactive





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Assent Customer Story: Ryerson Pivots to Manage PFAS

“As we started tackling it, first you get a couple of questions, then you get 20 questions, and then you realize this could be a full-time job, more than a full-time job. Ten people could do this. And we realized we needed expert assistance.”

— **Andrea Okun, Deputy General Counsel & Chief Compliance Officer, Ryerson**

Read the case study to learn how Ryerson, a metals manufacturer, reduced its product compliance program costs and kept ahead of customer requests for PFAS data with Assent.

How to Achieve Proactive PFAS Management

Having the right combination of expertise, data management platform, and support is key to creating a proactive program — because it’s just not possible with the old-fashioned spreadsheet and manual email approach.

You will need someone to monitor PFAS regulations across your target markets to ensure your program is addressing both today’s and tomorrow’s requirements. You’ll also need a solution that can digitally contact suppliers and collect PFAS data, and then centralize all that data while applying it to your product BOM. Finally, you’ll need processes to support suppliers if they have questions or are unresponsive. Without a solution that covers all three, PFAS compliance can be difficult to achieve on your own without hiring a team of researchers, product compliance specialists, and supplier technical support.





That's why implementing a proactive supply chain sustainability management solution is the fastest and most cost-effective way to get the benefits of proactive compliance. Here's how Assent combines expertise, support, and a software platform to deliver the leading PFAS solution for complex manufacturers:

- ▶ Automates supplier outreach using standardized and comprehensive PFAS questionnaires, eliminating the need for manual supplier emails and follow-ups
- ▶ Centralizes all your PFAS data, down to the parts of parts level, and rolls it up to the product level, allowing for the creation of PFAS declarations aligned with global PFAS reporting requirements. See all your PFAS usage at a glance, identify risks in your supply chain, and rapidly respond to customer requests
- ▶ Our team of regulatory experts constantly monitor global PFAS regulations and update the Assent platform to meet evolving requirements. Be confident that you're ahead of the regulatory curve without getting bogged down by in-house regulatory research
- ▶ Provides details on where each PFAS chemical is listed so you know your obligations and risks, using a built-in list of over 7,300 PFAS chemicals
- ▶ Collects information on planned product redesign and obsolescence risks from your suppliers, protecting you from costly disruptions
- ▶ Provides education and technical support to suppliers in the language of their choosing, improving engagement and data submission quality



It's Time to Take Action on PFAS

To stay resilient and competitive, businesses need a proactive PFAS solution to keep up with accelerating global requirements. Otherwise, they face a number of disruption and bottom-line risks. Assent's comprehensive PFAS solution has everything you need to start meeting existing reporting requirements and proactively mitigating the urgent risks associated with PFAS in your supply chain.

The regulatory landscape for PFAS is rapidly evolving on a global scale, and the costs (both regulatory and from legal liability) are accelerating. It's too complex for manufacturers to handle on their own.

Get in touch with an Assent supply chain sustainability expert today to book your custom demo and see how you can save time and money on your PFAS program.

Contact Assent

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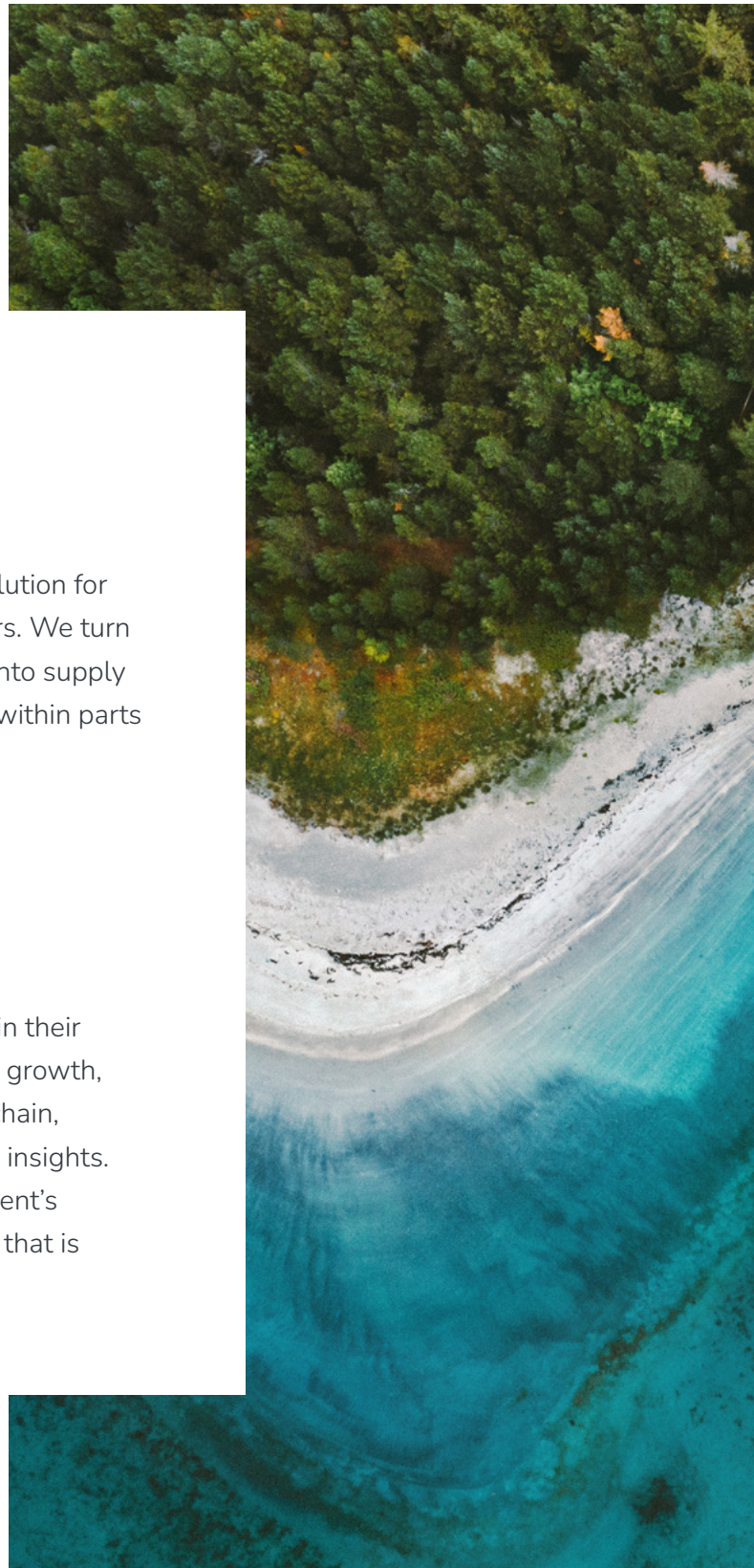


Who Is Assent?

Assent is the supply chain sustainability management solution for the world's most forward-thinking complex manufacturers. We turn sustainability goals into tangible action by delving deep into supply chains, identifying suppliers, parts, and even substances within parts to map the entire complex manufacturing genome.

What We Do

We help companies spot sustainability risks hiding deep in their supply chains and identify new areas of focus to enhance growth, efficiency, and value. By digging deep within the supply chain, we pull and validate more actionable data to provide real insights. Guided by regulatory experts with a diverse skill set, Assent's solution delivers a cross-enterprise view of sustainability that is necessary for true leadership in the field.





[Assent is] a low touchpoint program with very high results and program growth, year in and year out.

— Ryan Zelhofer, Former Product Compliance Manager, Plexus

Over **200,000**
parts managed

80% reduction in staff
management hours



The Assent Solution

The journey toward sustainability demands a new way of thinking about supply chains. Assent turns your supply chain data into a critical tool to make safe, sustainable, and ethical products by providing:

- ▶ Clean data collected from the source using automated engagement techniques that dive deeper into supply chains
- ▶ Crucial, at-a-glance supply chain sustainability data through streamlined dashboards
- ▶ An adaptable program that evolves alongside regulations and industry trends

People are the beating heart of any sustainability program. Assent combines its leading technology with expert guidance, ensuring each program is tailored to your specific needs. Dedicated customer success managers make sure you have a familiar face to speak to about changing program goals or enhancements.

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