

ATCS Stewardship and Safety

The Alliance for Telomer Chemistry Stewardship (ATCS) is a global organization that advocates on behalf of C6 fluorotelomer-based products. Our members are leading manufacturers of fluorotelomer based products in North America, Europe, and Japan. Our mission is to promote the responsible production, use, and management of fluorotelomer based products, while also advocating for a sound science- and risk-based approach to regulation.



ATCS Supports Responsible Stewardship and Best Practices

The Alliance for Telomer Chemistry Stewardship strongly supports policies that prohibit the use of AFFF for training exercises but allow for its continued use when needed to combat real world fires that risk public health and property damage.

The use and handling of AFFF follows recognized best practices to collect, contain, concentrate, and treat foams to ensure any potential environmental impacts are minimized. Our industry supports these best practices outlined by the Fire Fighting Foam Coalition¹ and Fire Protection Association Australia's² recently updated 'Selection and Use of Firefighting Foams' guidance document that seek to minimize emissions of firefighting foams to the environment, while delivering the best possible protections for life safety and critical infrastructure.

These best practices include provisions to "Provide for containment, treatment, and proper disposal of foam solution" particularly those used in major incidents where a diverse range of undesirable contaminants including PFAS are likely to be present in the firewater runoff, irrespective of whether C6 or alternative non-fluorinated foams have been used, "follow applicable industry standards for design, installation, maintenance, and testing of foam systems to ensure safety protections are not compromised", and to "develop plans for dealing with unplanned releases of foam concentrate or foam solution so as to minimize the environmental impact", irrespective of the foam type being used.



C6 Chemistry Has Been Evaluated for Safety

Fluorosurfactants used in modern AFFF formulations are supported by a robust body of data demonstrating they do not present a significant risk to human health or the environment.

The C6 fluorotelomer-based surfactants used in AFFF have been thoroughly reviewed by regulators prior to introduction into commerce, are subject to ongoing review, and are supported by a robust body of rigorous scientific health and safety data.

This assessment has also included review of potential breakdown (degradation) products. As reflected in the published scientific literature, studies have found that one of the primary potential breakdown products, perfluorohexanoic acid (PFHxA or C6 acid), does not cause cancer (NTP 2018; Klaunig et al. 2015; Loveless et al. 2009); does not disrupt endocrine (hormone) activity (Borghoff et al. 2018); does not cause reproductive or developmental harm (Loveless et al. 2009; Iwai et al. 2019, Iwai and Hoberman 2014); does not build up in the human body and does not become concentrated in the bodies of living organisms (Chengelis et al. 2009b; Iwai and Hoberman 2014; Russell et al. 2013, 2015; Nilsson et al. 2010, 2013; Fujii et al. 2015; Guruge et al. 2016; Gannon et al. 2011, 2016).

1. https://b744dc51-ddb0-4c4a-897d-1466c1ae1265.filesusr.com/ugd/331cad_55453ae7268c4fc1b5226fe1576bd2bf.pdf

2. http://www.fpaa.com.au/media/286787/fpa_australia_-_ib_06_v3_selection_and_use_of_firefighting_foams.pdf