

AMERICAN MEDICAL ASSOCIATION RESIDENT AND FELLOW SECTION

Late Resolution: 2
(I-26)

Introduced by: Laila Koduri, MD, MPH

Subject: Opposition to EPA Rules Delaying and Rescinding Federal PFAS Drinking Water Standards

Referred to: Reference Committee

Whereas, per- and polyfluoroalkyl substances (PFAS) are persistent synthetic chemicals that do not readily break down in the environment or the human body¹; and

Whereas, the 2024 PFAS National Primary Drinking Water Regulation established the first legally enforceable Maximum Contaminant Levels (MCLs) for six types of PFAS, including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA, commonly known as GenX Chemicals)¹; and

Whereas, long-term exposure to PFHxS above the regulatory level is associated with immune, thyroid, and liver dysfunction, as well as developmental effects following repeated exposure during pregnancy and/or childhood⁸; and

Whereas, health effects are associated in PFNA with elevated cholesterol levels and immune and liver effects, as well as developmental effects following repeated exposure during pregnancy and/or childhood and HFPO-DA with immune, liver, and kidney effects, potential concern for cancer, and developmental effects following repeated exposure during pregnancy and/or childhood⁸; and

Whereas, the 2024 National Primary Drinking Water Regulation established a Hazard Index MCL for perfluorobutane sulfonic acid (PFBS) where it co-occurs as part of mixtures with other PFAS where the combined levels of two or more PFAS requires action¹; and

Whereas, The First–Ever National Drinking Water Standard would protect an estimated 100 million people served by U.S. public water systems and would prevent thousands of deaths²; and

Whereas, on May 20, 2026, the U.S. Environmental Protection Agency published two proposed rules that would: 1) extend the compliance deadline for the PFOA and PFOS MCLs by two years, from April 26, 2029, to April 26, 2031, for water systems that request the extension; and (2) rescind the drinking water regulatory determinations and MCLs for PFHxS, PFNA, HFPO-DA, and the associated PFBS Hazard Index mixture^{3,4,7}; and

Whereas, the EPA's stated basis for the proposed rescission is a changed legal interpretation of the sequencing required by Section 1412(b)(1)(E) of the Safe Drinking Water Act, and not new scientific evidence that these PFAS no longer pose the health risks previously identified³; and

Whereas, delaying enforceable compliance deadlines and rescinding regulatory determinations for these PFAS substances would delay critically needed health protections for years into the future without scientific justification⁵; therefore be it

RESOLVED, that our American Medical Association (AMA) amend policy H-135.916 "Per- and Polyfluoroalkyl Substances (PFAS) and Human Health" by addition to read as follows:

1. Our American Medical Association supports continued research on the impact of perfluoroalkyl and polyfluoroalkyl chemicals on human health.
2. Our AMA supports legislation and regulation seeking to address contamination, exposure, classification, and clean-up of PFAS substances.
3. Our AMA will advocate for states, at minimum, to follow guidelines presented in the Environmental Protection Agency's Drinking Water Health Advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), with consideration of the appropriate use of Minimal Risk Levels (MRLs) presented in the CDC/ATSDR Toxicological Profile for PFAS.
4. Our AMA will amplify physician and public education around the adverse health effects of PFAS chemicals and potential mitigation and prevention efforts.
5. Our AMA will oppose the EPA's proposed rescission of the drinking water regulatory determinations and Maximum Contaminant Levels for perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide dimer acid (HFPO-DA/GenX), and the Hazard Index for mixtures of two or more PFAS).
6. Our AMA will advocate that any modification, delay, or rescission of enforceable federal drinking water standards for PFAS substances be based on peer-reviewed scientific evidence of reduced health risk; and be it further

RESOLVED, that this resolution be immediately forwarded to the AMA House of Delegates at the 2026 Interim Meeting.

Fiscal Note: Minimal

REFERENCES

1. Environmental Protection Agency. PFAS national primary drinking water regulation. *Fed Regist.* 2024;89(82):32532-32757. <https://www.federalregister.gov/documents/2024/04/26/2024-07773/pfas-national-primary-drinking-water-regulation>
2. US Environmental Protection Agency. Biden-Harris administration finalizes first-ever national drinking water standard to protect 100M people from PFAS pollution. News release. April 10, 2024. <https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-first-ever-national-drinking-water-standard>
3. Environmental Protection Agency. Rescission of regulatory determinations and removal of related provisions for four PFAS substances (PFHxS, PFNA, HFPO-DA (GenX), and the mixture of these three PFAS plus PFBS). *Fed Regist.* 2026;91:29413-29425. <https://www.federalregister.gov/documents/2026/05/20/2026-10085/rescission-of-regulatory-determinations-and-removal-of-related-provisions-for-four-pfas-substances>
4. Environmental Protection Agency. Extending the compliance deadline for the PFOA and PFOS maximum contaminant levels. *Fed Regist.* 2026;91:29425-29448. <https://www.federalregister.gov/documents/2026/05/20/2026-10086/extending-the-compliance-deadline-for-the-pfoa-and-pfos-maximum-contaminant-levels>
5. Environmental Protection Network. EPA's PFAS promises undermined by safeguard delays & rollbacks, along with weakened scientific capacity, still leaves millions exposed to dangerous "forever chemicals." Press release. May 18, 2026. https://www.environmentalprotectionnetwork.org/20260518_epa-pfas-announcement_release/
6. Association of State Drinking Water Administrators. ASDWA submits comments on proposed PFAS compliance extension and rescission rules. July 24, 2026. <https://www.asdwa.org/2026/07/24/asdwa-submits-comments-on-proposed-pfas-compliance-extension-and-rescission-rules/>
7. Environmental Protection Agency. Extending the compliance deadline for the PFOA and PFOS maximum contaminant levels. Docket EPA-HQ-OW-2025-1742. Document EPA-HQ-OW-2025-1742-0001. Regulations.gov. <https://www.regulations.gov/document/EPA-HQ-OW-2025-1742-0001>
8. US Environmental Protection Agency. National primary drinking water regulations. Updated August 31, 2026. <https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>

RELEVANT AMA POLICY

Per- and Polyfluoroalkyl Substances (PFAS) and Human Health H-135.916

1. Our American Medical Association supports continued research on the impact of perfluoroalkyl and polyfluoroalkyl chemicals on human health.
2. Our AMA supports legislation and regulation seeking to address contamination, exposure, classification, and clean-up of PFAS substances.
3. Our AMA will advocate for states, at minimum, to follow guidelines presented in the Environmental Protection Agency's **Drinking Water** Health Advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), with consideration of the appropriate use of Minimal Risk Levels (MRLs) presented in the CDC/ATSDR Toxicological Profile for PFAS.
4. Our AMA will amplify physician and public education around the adverse health effects of PFAS chemicals and potential mitigation and prevention efforts.

[Res. 901, I-19; Modified: Res. 428, A-24]