Federal Policy Recommendations to Address PFAS Contamination on Agricultural Land

PFAS AND AGRICULTURE POLICY WORKGROUP

About the PFAS and Agriculture Policy Workgroup

The PFAS and Agriculture Policy Workgroup, led by American Farmland Trust, represents a broad range of agricultural stakeholders. They have come together to develop and advance a comprehensive set of policy recommendations to address PFAS contamination of U.S. agricultural land.

Contributors include:

Courtney Briggs, Senior Director, Government Affairs, American Farm Bureau Federation

Clay Detlefsen, Senior Vice President, Regulatory & Environmental Affairs, National Milk Producers Federation

Carson Fort, Government Affairs Manager, American Soybean Association

RJ Karney, Senior Director, Public Policy, National Association of State Departments of Agriculture

Ben Knuth, Agriculture Policy Manager, National Wildlife Federation

Emily Liss, Farm Viability Policy Manager, American Farmland Trust

Nancy McBrady, Deputy Commissioner, Maine Department of Agriculture, Conservation and Forestry

Julie McClure, Vice President, Torrey Advisory Group (on behalf of the Agronomy, Crop, and Soil Science Societies)

Shelley Megquier, Policy and Research Director, Maine Farmland Trust

Adam Nordell, Campaign Manager–Maine Farmland Contamination, Defend Our Health

Rachel Orf, Director, Environmental Stewardship, National Corn Growers Association

Bill Pluecker, Public Policy Organizer, Maine Organic Farmers and Gardeners Association

Nick Rossi, Policy Specialist, National Sustainable Agriculture Coalition

Aaron Shier, Government Relations Director, National Farmers Union

The PFAS and Agriculture Policy Workgroup would also like to thank the many other organizations, agency officials, and congressional staff who contributed their expertise to these recommendations.

These recommendations reflect the areas of shared priority across the organizations that form the PFAS and Agriculture Policy Workgroup. They should not be considered a comprehensive policy platform for any individual organization.

SEPTEMBER 2025

COVER PHOTO: EMHOLK/ISTOCKPHOTO

Federal Policy Recommendations to Address PFAS Contamination on Agricultural Land

PFAS AND AGRICULTURE POLICY WORKGROUP

CONTENTS

Introduction

BACKGROUND

Per- and poly-fluoroalkyl substances, commonly known as "PFAS," are a class of thousands of synthetic chemicals used for their water and grease-resistant properties. They have been widely used in manufacturing for decades and are broadly utilized in consumer and industrial products. Often referred to as "forever chemicals," PFAS do not break down naturally. Because they are highly mobile in the environment, they are able to accumulate in ground and surface water, soil, crops, animals—and people. Certain PFAS have been linked to a wide range of negative health outcomes, including various forms of cancer.

PFAS came to public prominence as an agricultural issue in 2016 after being detected on a dairy farm in Maine. The farmer had spread biosolids—or treated sewage sludge—on his land for years as a form of fertilizer, a practice that has been allowed and regulated by the EPA for decades. Unbeknownst to him, these biosolids contained high levels of PFAS from contaminated industrial and household wastewater. Although efforts were made to return the dairy to operation, it eventually had to close.

Since then, PFAS contamination of agricultural land has become a national issue, sparking concern from farmers, ranchers, and the public alike.[1] In New Mexico and Colorado, farms and ranches have been contaminated by runoff from Air Force bases. In Michigan—like Maine—farms have been impacted by spreading biosolids on fields. In Texas, ranches have been contaminated by biosolids that were not directly applied to their land, but rather migrated from a neighboring property. In West Virginia, a farm was contaminated by runoff from a leaking landfill.

This contamination has harmed farm families and farm businesses, raised public concerns about the safety of our food system, and damaged agricultural land and the broader environment.

1. In the interest of conciseness, this paper primarily uses the terms "farm" and "farmer," which should be considered as inclusive of all agricultural operations, including ranching.

Because PFAS and agriculture is an emerging issue, many questions still remain: *How many farms and ranches are contaminated? How can we safely maintain the productivity of impacted agricultural land? How can we mitigate or eliminate any health impacts? What role should the federal government play?*

Fortunately, there is hope. Although there is currently no way to remove PFAS from soil at scale, the experience of the state of Maine shows that with proper support, most contaminated farms can safely return to production and future contamination can be avoided. But achieving these goals nationally will require critical changes in policy.

Recognizing the potential impacts of PFAS on our nation's agricultural system, and the need for a well-considered federal response, American Farmland Trust launched a process in June 2024 to convene a diverse set of agricultural stakeholders to develop a shared set of policy recommendations. These stakeholders represent commodity, farmer, conservation, health, and research groups as well as state departments of agriculture. Over the course of a year, these groups worked together to identify solutions for this challenging issue, knowing that the complexity of the topic required a response shaped by stakeholders spanning the sector. The following policy goals formed the foundation for these recommendations:

- Protect farmers, ranchers, and their families from the negative health impacts of PFAS,
- Keep farm and ranch businesses in operation, and
- Maintain the safety of the U.S. food supply.

The recommendations in this document—which may be updated in the future to reflect new understanding of the issue—represent the best efforts of the participating organizations to navigate uncharted waters. They are intended to be bold yet pragmatic, non-partisan, actionable, and aim to balance the need for thoughtful, research-led solutions with the need to swiftly protect farm families, agricultural businesses, and consumers from the harmful impacts of PFAS.

RECENT FEDERAL ACTIONS

The federal government—particularly USDA, EPA, and FDA—is already engaged in addressing PFAS contamination of farms and food in multiple ways. Work on PFAS and agriculture began under the first Trump Administration, including the launch of efforts examining the risks posed to farmers and the food system from biosolids, and increasing coordination between federal agencies. Currently, FDA and USDA test some of the food products they regulate and state that they will take action if a food contains levels of PFAS that could impact human health. These agencies also develop and refine testing methods for different PFAS in foods, which they then share with state regulators and other stakeholders.

USDA also provides financial assistance to some impacted producers and communities. The Department uses the Dairy Indemnity Payment Program to support PFAS-impacted dairy farmers, and offers financial assistance to farmers for PFAS testing through the Environmental Quality Incentives Program. It also helps rural communities with PFAS-contaminated water through its Emergency Community Water Assistance Grant Program and Water and Waste Disposal Loan and Grant Programs, while EPA uses its Emerging Contaminants in Small and Disadvantaged Communities Grant Program for the same purpose.

SHAWN LINEHAN

In addition, the federal government is engaged in research related to PFAS and agriculture. USDA's Agricultural Research Service examines the impacts of PFAS on food and agriculture and recently established a PFAS Center of Excellence at the University of Maine. USDA's National Institute of Food and Agriculture and the Natural Resources Conservation Service (NRCS) fund extramural research on PFAS at universities and other institutions. The EPA funds research on the impacts of PFAS on food and agriculture, and USDA research investments also explore impacts and toxicological issues for both legacy and more recent PFAS, as well as PFAS precursors (chemical compounds that degrade into PFAS).

In May 2025, EPA reiterated its commitment to addressing PFAS by announcing planned major actions. These include developing effluent limitation guidelines for PFAS manufacturers and metal finishers; establishing a liability framework that operates on the "polluter-pays principle" while protecting passive receivers (like farmers); and preventing further contamination of drinking water. In 2025, USDA NRCS continued funding to the National Academy of Science, Engineering, and Medicine for assistance in building a framework for addressing PFAS on agricultural lands. This study will provide recommendations that will help USDA determine how to advance conservation priorities in light of the uncertainties and challenges of PFAS contamination of land and water.

The participating groups are encouraged by these activities and investments and by the Trump Administration's recent commitments. The groups expect that all programs and policies currently addressing PFAS will continue operating at full capacity and that the recommendations below will be considered as additions—not replacements—to this ongoing federal work.

Provide Relief and Long-Term Support for Impacted Farmers and Ranchers

Farmers, ranchers, and agricultural landowners affected by PFAS contamination of soil, water, crops, or animals can face devastating impacts. This includes personal impacts such as potential health issues caused by elevated exposure to PFAS, economic impacts like lost income if they must halt production, and business impacts like needing to pivot to new practices and production systems in order to reduce contamination of their products. In some cases, PFAS-impacted farmers have been forced to permanently close their operations. Fortunately, with appropriate health, economic, technical, and business support, many of these challenges can be overcome. A robust safety net for impacted farmers is also key to enabling additional voluntary testing of soil and water, since many farmers are hesitant to do so for fear that contamination could lead to the loss of their livelihood. Furthermore, it is critical that any regulatory efforts related to agriculture be done in tandem with relief and support for impacted farmers.

CONGRESSIONAL RECOMMENDATIONS

1. **Congress should establish and adequately fund a dedicated agricultural PFAS relief and support program to protect farmer health, provide financial relief, and support operational changes that enable businesses to safely remain in production.** At present, the only federal program providing support to PFAS-impacted farmers is the Dairy Indemnity Payment Program, which offers short-term support for just a single commodity, leaving many impacted farmers without a vital safety net. While other federal programs could be altered to address PFAS, this could threaten the ability of these programs to meet their intended purposes. Given these constraints, a dedicated PFAS program with adequate funding is essential to addressing PFAS. Such a program would support the following types of eligible uses:

    - *Protect farmer health* through routine health monitoring, blood serum testing, medical care, and mental health services. These services should also be extended to impacted farm families, farmworkers, and others affected by farm contamination, such as neighbors.
    - *Provide financial relief* through short-term income replacement caused by halted production, financial compensation for contaminated agricultural land, products, and livestock, and support for voluntary state purchase of highly contaminated lands.
    - *Improve capacity of—and farmer access to—PFAS testing of land, water, crops, and livestock.*
    - *Help farmers with contaminated land remain safely in production* by providing technical assistance for practice changes or adoption of new production systems (e.g., growing crops with low PFAS uptake), financial assistance for equipment, land, and other capital purchases, as well as marketing and business planning.
    - *Reduce potential additional contamination* by installing water filtration systems and helping interested farmers transition from using biosolids as fertilizer.

- *Inform and equip farmers* by supporting outreach and education efforts and funding "PFAS Navigators" to work directly with farmers to help them understand programs and regulations.

An agricultural PFAS relief and support program would ideally be administered by USDA, but conducted as a block grant program enabling states to tailor their response to meet unique local circumstances. One example of such a program is outlined in the bipartisan, bicameral *Relief for Farmers Hit with PFAS Act of 2023*.

2. **Congress should review and identify programs that could be modified to address agricultural PFAS contamination—such as the Livestock Indemnity Program (LIP)—and make statutory changes to help them best support impacted farmers and ranchers.** While a dedicated program is ultimately the best solution, efforts should be made to enable the existing safety net to address PFAS in ways that are compatible with the original intent of the program. For example, LIP currently covers livestock losses related to natural disasters and disease, but does not cover impacts related to PFAS. Because contamination from certain PFAS could cause premature death and the inability to sell livestock, it is consistent with the intent of the program to consider elevated PFAS levels an eligible loss condition. The program should also reimburse farmers who choose to depurate livestock (allow the PFAS to pass out of their systems) rather than depopulate.

REBECCA DROBIS

ADMINISTRATIVE RECOMMENDATIONS

3. **The Department of Defense (DoD) should provide relief and support to farms and ranches that were contaminated with PFAS as a result of its actions.** The *National Defense Authorization Act of FY 2021* directed DoD to notify farms and ranches located within one mile of a military installation or national guard facility if the installation's groundwater testing showed PFAS contamination. As a result, between March 2021 and March 2023, the Department sent out 3,911 letters to potentially impacted farms and ranches.[2] In addition, the *National Defense Authorization Act of 2020* gave the Department authority to enter into cooperative agreements with states to address PFAS contamination, and to acquire real property contaminated with PFAS due to Air Force activities, including paying for relocation expenses. Despite these authorities, DoD does not currently provide any assistance to impacted agricultural operations. The Department should make full use of these authorities, and provide additional support to impacted farmers, such as conducting soil and water testing, compensating farmers for financial losses or expenses, supporting mitigation activities such as water filtration, and providing access to medical care.

4. **USDA should review and identify programs that could be modified to address PFAS contamination—such as the Dairy Indemnity Payment Program (DIPP)—and make changes to policies and regulations to help them best support impacted farmers.** While it is consistent with the intent of some existing USDA programs to support PFAS-impacted farmers, programs may need administrative changes to make PFAS an eligible concern or condition, or to improve their effectiveness at addressing the issue. For example, DIPP regulations were recently amended by USDA to specifically cover PFAS-related losses. However, payments have gone out slowly to farmers, limiting the program's positive impact. In addition, the program could be optimized by streamlining the application process, expediting payments, raising the payment cap, and extending the eligible period for benefits from 3 months to 2 years to cover the time that it takes for cows to depurate.

5. **The EPA and USDA should work together to provide safe drinking water to PFAS-impacted farmers and their communities**. USDA Rural Development should use its Emergency Community Water Assistance Grant program to the fullest extent possible to provide farmers and impacted neighbors with clean water by supporting line extension, cost of new wells, and installation and maintenance of filters on existing wells. Rural Development should also use funds from its Water and Waste Disposal Loan and Grant program to help public water systems with PFAS treatment. In addition, the EPA should use the Emerging Contaminants in Small or Disadvantaged Communities Grant Program to address PFAS contamination.

2. Department of Defense, "Status of Notifications to Agricultural Operations for Fiscal Year 2023." July 2023. https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Status-of-Notifications-to-Agricultural-Operations-for-Fiscal-Year-2023.pdf

Protect Farmers from Unreasonable Liability under CERCLA

In April 2024, the EPA designated two PFAS (PFOA and PFOS) as hazardous substances under the *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*, also known as "Superfund."[3] Under CERCLA, the EPA can clean up contaminated sites and compel entities that bear responsibility for all or part of the contamination ("potentially responsible parties" or PRPs) to perform or pay for cleanup activities. There is concern that farmers could be a responsible party for PFAS contamination of land or water, whether due to spreading contaminated biosolids on land or PFAS migration from nearby releases from industrial sites, airports and defense facilities that used PFAS-containing fire-fighting foam, or other sources. Under CERCLA, farmers could be held liable even if they had no knowledge of the PFAS release and, in the case of biosolid spreading, even if the actions taken were consistent with federal and state policies and regulations. Although the EPA issued an PFAS Enforcement Discretion and Settlement Policy Under CERCLA stating that it will not pursue potential claims against farmers under CERCLA for the use of biosolids, this is not legally binding; could be changed by future administrations; does not automatically protect farmers from third-party compensation claims; and does not protect them from liability for PFAS that migrated onto their property.

It is important to note two things. First, the EPA does not currently regulate PFAS in biosolids, and land application of biosolids remains a federally-approved agricultural practice. At the same time, CERCLA imposes potential liability on farmers for PFAS, which can be found in land-applied biosolids. The conflict between these policies—and the fact that a farmer could be held liable without ever breaking a law—is the reason for these recommendations. Second, it is important to note that these recommendations are not intended as a blanket exemption from CERCLA liability or other regulations. Liability protections should not apply in cases where a farmer knowingly spread contaminated biosolids, or acted in direct violation of state or federal regulations—such as spreading biosolids in a state where land application is banned.

ADMINISTRATIVE RECOMMENDATIONS

1. **The EPA should reaffirm and continue its current enforcement discretion policy that states that the Agency will not hold farmers liable under CERCLA for PFAS contamination caused by spreading biosolids.** The EPA issued its enforcement discretion policy to help clarify which entities it intends to pursue—or not pursue—under CERCLA. It states that the Agency will "focus on holding accountable those parties that have played a significant role in releasing or exacerbating the spread of PFAS into the environment, such as those who have manufactured PFAS or used PFAS in the manufacturing process." Furthermore, the policy states that EPA "does not intend to pursue entities where equitable factors do not support seeking response actions or costs under CERCLA, including [. . .] farms where biosolids are

3. Environmental Protection Agency, "Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances." https://www.epa.gov/superfund/designation-perfluorooctanoic-acid-pfoa-and-perfluorooctanesulfonic-acid-pfos-cercla

applied to the land." In addition, farmers are generally considered "passive receivers" of PFAS, meaning that they may receive media containing PFAS (and other hazardous substances) but do not themselves manufacture or use those substances.[4] Because of these precedents, any cost recovery under CERCLA against farmers has the potential to be unfair since it would not be in keeping with CERCLA's "polluter pays" principle and farmers generally lack the financial resources to meaningfully contribute to cleanup.

2. **The EPA should provide additional clarity on its PFAS enforcement discretion policy by publishing a document detailing the "equitable factors" that it relied upon to determine that it would not find farmers liable for PFAS contamination from applications of biosolids.** The EPA's enforcement discretion policy states that it will not compel farmers who used biosolids to conduct or pay for cleanup activities due to "equitable factors." However, the Agency does not specify these factors. As such, the EPA should publish a document describing these factors to explain their legal and factual basis for determining that farmers should not be held liable. This will help the public and other agencies better understand the Agency's rationale for protecting farmers from third-party liability. The EPA should include the following factors in providing this rationale: that farmers complied with current EPA regulations allowing for biosolid applications, that they received no benefit from the PFAS present in biosolids, and that they are generally unable to contribute meaningfully to the cost of cleanup.

4. Congressional Research Service, "Statement of Kate R. Bowers Legislative Attorney Before Committee on Environment and Public Works U.S. Senate Hearing on 'Examining PFAS as Hazardous Substances.'" March 20, 2024. https://www.everycrsreport.com/files/2024-03-20_TE10093_6d9056b0e7cfe91948224492f9435808f6c5f61f.pdf

3. **The EPA should amend its enforcement discretion policy to explicitly state that it will not enforce against farmers and ranchers whose property is part of a Superfund site due to PFAS migration from another property.** Farm and ranch land can be contaminated with PFAS due to the migration of contaminants from a nearby release. Migration can occur through surface water, ground water, or even the movement of dust or soil. In these situations, the farmer was not part of the PFAS release, but rather was a passive receiver of the contaminant. The enforcement discretion policy should acknowledge that if such contamination is found, farmers bear no responsibility or liability under CERCLA.

4. **The EPA should officially state that applying biosolids in compliance with EPA and/or state regulations for the purpose of fertilizing agricultural land is not a "release" of a hazardous substance under CERCLA.** According to the enforcement discretion policy, CERCLA excludes the "normal application of fertilizer" from the definition of a "release." Farmers apply biosolids to their land as a fertilizer, yet EPA has not stated that this practice—which has been regulated and promoted by the EPA for decades—qualifies as "a normal application of fertilizer."

5. **The EPA should establish and enter into a standard settlement agreement to protect farmers from being compelled to financially contribute to the cleanup of a PFAS Superfund site by other potentially responsible parties.** CERCLA makes many parties jointly liable for the cleanup of a contaminated property (e.g., the property owner, the operator, the entity that disposed of the chemical), and allows potentially responsible parties (PRPs) to sue one another to share in the cleanup expenses. Although the EPA has stated that it will not enforce against farmers, a farmer with contaminated property could still be sued by other PRPs in third-party litigation. EPA's enforcement discretion policy states that the Agency can enter into a settlement to protect entities—like farmers—from being compelled to pay other PRPs. This effectively grants the farmer immunity from a third-party lawsuit, and protects them from financial contribution. However, entering into a settlement can be a cumbersome process. To provide farmers with additional protection, and expedite the process, the EPA should establish a standard settlement agreement to use when farmers who are PRPs—and who EPA has agreed not to pursue—are sued by another PRP. The agreement would settle all claims for the Superfund site, and prevent the farmer from being held liable and making any financial contribution to another PRP.

Reduce Additional PFAS Contamination of Agricultural Land

PFAS have contaminated agricultural land through multiple pathways, but biosolids appear to be the primary mechanism. Biosolids, or treated sewage sludge, are the end-product of the wastewater treatment process. According to the EPA, 31% of biosolids generated in the nation are applied to agricultural land as fertilizer due to their high nutrient value and low cost.[5] PFAS can be found in biosolids in varying levels due to contaminated industrial and household wastewater. Because of this, some states have begun to ban the agricultural use of biosolids (e.g., Maine) or require/recommend that biosolids test below certain levels prior to application (e.g., Vermont, Michigan, Maryland, Connecticut). Since there is currently no technology to remove PFAS from soil at scale, reducing additional contamination—often referred to as "turning off the tap"—is critical to addressing the issue. Federal action on this issue would also help to ensure greater consistency across state lines.

ADMINISTRATIVE RECOMMENDATIONS

1. **The EPA—in close coordination with USDA—should consider developing a health-based PFAS threshold for all land-applied biosolids as well as regular testing requirements for wastewater treatment plants.** Research shows that applying biosolids contaminated with PFAS to agricultural land can increase health risks for farmers and those who rely heavily on products from individual farms.[6] The EPA should continue its work on the Draft Sewage Sludge Risk Assessment for PFOA and PFOS, including thoroughly reviewing and addressing public comments. Once this input has been fully considered, the EPA should use it to inform the development of a PFAS threshold for biosolids applied to agricultural land which would protect human health. In addition, the EPA should also consider conducting additional risk assessments on other PFAS, including precursors. In setting the requirement, the EPA—in conjunction with state regulators—should conduct a pilot program to test biosolids from wastewater treatment plants and review results. This would help determine whether a sufficient number of biosolids test below the proposed PFAS threshold to make regular testing useful. If the federal government establishes a threshold for PFAS in agricultural biosolids, it should consider providing temporary financial support to farmers who are required to find alternate nutrient sources.

5. EPA, "Basic Information about Sewage Sludge and Biosolids." https://www.epa.gov/biosolids/basic-information-about-sewage-sludge-and-biosolids
6. EPA, "Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS)." January 2025. https://www.epa.gov/system/files/documents/2025-01/draft-sewage-sludge-risk-assessment-pfoa-pfos.pdf

WILL PARSON/CHESAPEAKE BAY PROJECT

2. **USDA and EPA should work together to identify existing voluntary programs that can assist farmers interested in transitioning away from using biosolids.** Many farmers use biosolids because they are a low-cost—if not free—source of nutrients for their crops. Opportunities should be explored to use existing federal programs to provide financial and technical assistance for farmers interested in transitioning from biosolids. For instance, USDA could consider expediting nutrient management planning support for these farmers through the Environmental Quality Incentives Program.

Coordinate and Invest in PFAS Research

PFAS is an emerging issue, and while our understanding of PFAS and its impacts on agriculture is improving, there are still many questions to be answered. Given this, there is a critical need to coordinate and invest in additional research to deepen our knowledge of many different facets of this issue, including how, where, and in what crops and animals PFAS accumulates, the health impacts of PFAS to farmers and consumers, and the steps that farmers can take to avoid contamination in their crops and livestock. There is similarly a need to develop additional soil, water, and livestock remediation techniques, PFAS destruction technologies, standardized testing methods, and more. Research will also be key to helping policymakers better understand the scope of the issue, and how to develop a proportional and informed policy response. The size of this issue calls for an all-hands-on-deck approach which takes full advantage of the research capacity of federal agencies, land-grant and other universities, states, organizations, and corporations.

CONGRESSIONAL RECOMMENDATIONS

1. **Congress should establish PFAS as a research priority within the Farm Bill.** While additional dedicated funding for PFAS research will be critical, many federal research programs already have considerable flexibility in the topics they explore. Given this, PFAS should be added to the list of "high priority research and Extension initiatives" within the Farm Bill to provide a clear signal from Congress to USDA that additional focus should be placed on addressing this critical challenge.

ADMINISTRATIVE RECOMMENDATIONS

2. **USDA should prioritize research.** The administration should declare PFAS an agricultural research priority and invest more flexible program dollars into the issue from the Agricultural Research Service (ARS), the National Institute of Food and Agriculture, the Natural Resources Conservation Service, the Animal and Plant Health Inspection Service, and other relevant agencies. Consideration should also be given to creating an Agriculture and Food Research Initiative Coordinated Agricultural Project dedicated to PFAS. Such large, interdisciplinary efforts involving multiple institutions across the nation have been critical to advancing our understanding of other key challenges facing agriculture.

3. **The Administration should develop an interagency research agenda for PFAS and agriculture and coordinate this research across federal agencies and with state and nonprofit partners.** Addressing PFAS and agriculture will require a coordinated approach within USDA, throughout the federal government, and across the entire sector. USDA and its federal partner agencies should establish a broader research agenda for PFAS and identify which departments and agencies should lead portions of that agenda. Considering USDA's small research budget relative to other departments, its efforts are best concentrated on

PEGGY GREB/USDA

agricultural components, such as examining the changes needed for contaminated farms to remain safely in production and the establishment of standard testing methodologies for soil, water, and agricultural products. This process of developing a PFAS agricultural research agenda is already underway within ARS. Other critical topics, like soil remediation and human health impacts, may be better conducted by EPA, FDA, NIH, CDC, DoD, the National Science Foundation, and other agencies, with USDA coordination and input. Coordination should also consider research being conducted by state governments, public and private universities, Cooperative Extension, State Agricultural Experiment Stations, and others to ensure that it is additive rather than duplicative.

4. **USDA should leverage public-private partnerships to advance PFAS and agriculture research while maximizing the use of federal funds.** In addition to utilizing publicly-funded programming, USDA can partner with other sources of research funding such as checkoff programs to explore research solutions specific to individual commodities. The Foundation for Food and Agricultural Research (FFAR) can also be used to combine federal and private dollars to support research by various institutions. FFAR is already funding critical PFAS research, including on PFAS-contaminated biosolids.

5. **The National Academies of Sciences, Engineering, and Medicine (NASEM), led by its Board on Agriculture and Natural Resources (BANR), should conduct a meta-analysis on the state of PFAS science relevant to agriculture and identify the most critical topics to inform federal research and funding priorities.** Having a clear sense of the most pressing areas for agricultural research, as well as the areas where there is already a high level of scientific consensus, will help ensure efficient and effective use of limited federal resources.

Implement a Coordinated Education and Risk Communications Strategy

Farmers and the general public are increasingly concerned about agricultural PFAS contamination but have insufficient access to clear and useful information. This has led to confusion about what farmers should do, and fear among some segments of the public. While the federal government—including EPA, FDA, and USDA—has begun engaging on PFAS, its efforts have often lacked coordination and a clear strategy for risk communications. A more coordinated response would ensure that farmers receive consistent and actionable information, that policy development and program implementation are aligned, and that resources are used effectively. Stronger collaboration between USDA, EPA, FDA, and other agencies—as well as with states and other stakeholders—is critical to streamline federal efforts, reduce conflicting priorities and messaging, and deliver clearer guidance and support to affected farmers.

CARLY WHITMORE/NRCS-USDA

ADMINISTRATIVE RECOMMENDATIONS

1. **USDA, EPA, and FDA should implement PFAS education and risk communications initiatives to provide consistent, transparent, and useful information to farmers, other stakeholders, and the general public.** This initiative should include efforts to inform stakeholders about PFAS (including the safety of the food supply, the risks it poses to farmers and the public, and how to reduce and mitigate on-farm contamination), and direct farmers to state and federal resources. Within the federal government, the initiative should promote coordination and collaboration on messaging between USDA, FDA, EPA, CDC and other federal agencies and state government officials. These agencies should also capitalize on partnerships with nonprofit organizations, commodity groups, states, and farmer organizations to help develop this initiative and expand the reach of federal education and risk communications work.

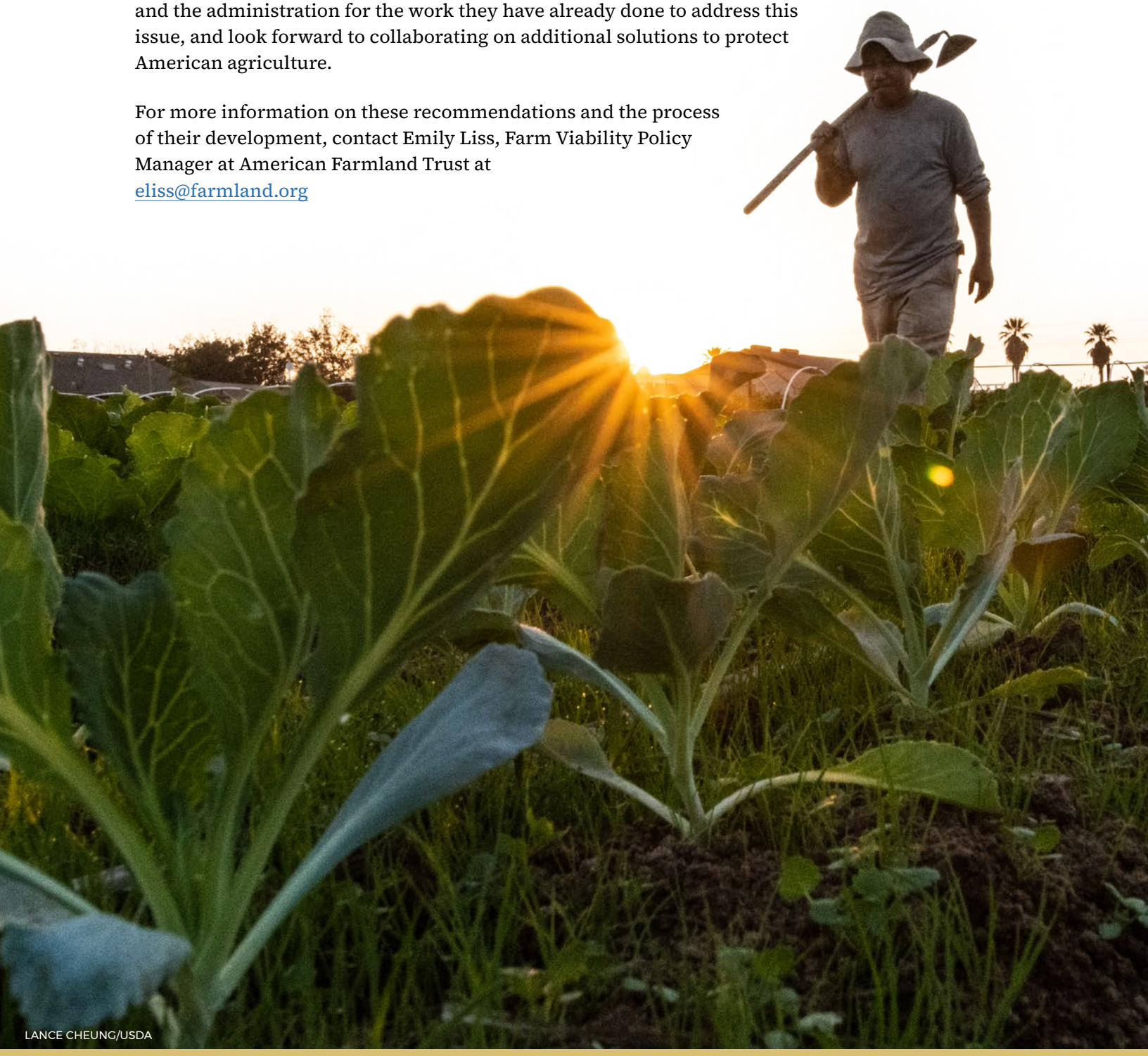
2. **USDA should designate a full-time PFAS Coordinator reporting to the Office of the Secretary to coordinate PFAS workstreams within USDA and with partner agencies.** USDA engagement with PFAS spans much of the Department, including research on PFAS, safety inspections of USDA-regulated foods, support for rural water systems and impacted dairy farmers, and more. In addition, the EPA and FDA carry out PFAS activities that impact agricultural programs and stakeholders, such as the EPA's Hazardous Substance designation of PFAS and FDA's routine testing of food products. Within USDA, this PFAS Coordinator position would focus on increasing coordination and collaboration and ensuring consistent messaging and efficient resource-use across all of the Department's PFAS workstreams, particularly policy development and program implementation (e.g., addressing complex issues such as how federal programs interact with potentially contaminated lands and waters). The Coordinator would also serve as the chief liaison to EPA and FDA on PFAS matters in order to improve communication and coordination among the three agencies as well as policy development, program implementation, resource allocation, and public communications. Finally, the Coordinator would be responsible for managing communications with external stakeholders regarding the Department's work on PFAS, including state departments of agriculture, commodity groups, and other organizations.

3. **USDA Service Center staff should be equipped to serve as a first point of contact for PFAS-related inquiries from farmers and landowners.** PFAS is a new, confusing, and concerning issue. Although USDA does have PFAS resources available online, farmers and landowners often turn to locally-based NRCS, Farm Service Agency, and Rural Development staff as a source of information. These staff operate out of USDA Service Centers which are found in nearly every county and often have long-standing relationships with farmers. USDA should provide special training to these staff so they are knowledgeable about both the basics of PFAS and agriculture as well as available federal, state, and local resources. Service Center staff should be equipped to direct farmers to resources such as USDA or state programs that support impacted farmers, local entities that can test for PFAS, technical assistance providers, and more. USDA should consider making these trainings and resources publicly available so that other farmer-facing entities (e.g., nonprofits, Cooperative Extension, farm groups, crop advisors) can provide consistent, up-to-date information.

Conclusion

The recommendations outlined in this document reflect the PFAS and Agriculture Policy Workgroup's shared commitment to protecting the agricultural community from the impacts of PFAS contamination. Grounded in the goals of safeguarding health, sustaining agricultural livelihoods, and ensuring the safety of our food supply, these proposals offer a pragmatic, nonpartisan path forward. We thank Congress and the administration for the work they have already done to address this issue, and look forward to collaborating on additional solutions to protect American agriculture.

For more information on these recommendations and the process of their development, contact Emily Liss, Farm Viability Policy Manager at American Farmland Trust at eliss@farmland.org



LANCE CHEUNG/USDA

SHAWN LINEHAN