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GORE'S STATEMENT ON TENTATIVE INTERIM AMENDMENT (TIA) SUBMISSION (LOG #1594), JULY 2021

Issues related to firefighter safety and protection are extremely important to W. L. Gore & Associates. Along with the rest of the firefighting industry, Gore recognizes the significant rate of different cancers being reported among firefighters and is concerned about the devastating impact the disease can have on firefighters, their families, and the firefighting community. We agree that it is a priority to minimize firefighter risks based on scientific evidence, and Gore supports additional peer-reviewed research properly designed to evaluate potential causes of cancer firefighters face on the job. Based on our review of available science, Gore concludes its firefighting products are not the cause of cancers impacting firefighters.

Gore is confident in the safety and performance of our technical firefighting products and proud to offer a range of products that meet the needs of firefighters and often exceed the relevant firefighting industry technical standards.

Gore values the important work done by NFPA and other global organizations to establish and revise technical standards for protective firefighting apparel and gear. Gore's purpose in submitting this comment is to address statements in the TIA regarding PTFE, a specific PFAS chemistry with unique properties. We acknowledge the interest for removing the Light Degradation Resistance Test and reevaluating Section 8.62 of NFPA Standard 1971, which was proposed in the recent NFPA Tentative Interim Amendment (TIA).

Gore, however, is very concerned with certain statements within the TIA pertaining to PFAS, a term that applies to a very broad group of chemistries with very different uses and properties. As written, the TIA is misleading and more clarity should be provided about the PFAS chemistries in the firefighting gear rather than broad descriptions that are not relevant for the application and, in some cases, factually inaccurate. As written, the TIA appears to suggest that PTFE causes cancer in firefighters. This is not the case.

Gore uses ePTFE (an expanded form of PTFE) for the thin waterproof and breathable membranes at the heart of all of our GORE® moisture barrier products for the firefighting industry. PTFE is a member of the fluoropolymer class of per-and polyfluorinated alkyl substances (PFAS) and it is broadly recognized as safe for products of high societal value, including implantable medical devices. Please follow this link for more information on PFAS and Gore's structural firefighting products.

For 40 years, PTFE has proven to be a safe and reliable material for moisture barriers because its chemical and physical properties enable it to withstand exposure to high temperatures and protect against a wide range of biological contaminants and harsh substances. PTFE is extremely durable, flexible, and thermally stable, making it well suited to withstand the exceptional physical rigors of the job and maintain its performance for many years.

Unfortunately, the TIA substantiations, as written, cast unnecessary and inappropriate doubt upon the safety of PTFE, a PFAS material used in Gore's moisture barriers. Should the TIA proceed based on the included substantiations, an unintended consequence may be actually limiting the choices that firefighters should have to select highest performance materials helping to protect them against many hazards faced on the job. Gore supports innovation and exploration of alternative technologies and material sets as well as a robust science-based challenge to current understandings to advance firefighter safety. Gore is honored and proud to serve the firefighting community with safe and effective first in class components for turnout gear, and we rely on the body of available and relevant science to refute any claims that PTFE causes cancer in firefighters.