

May 13, 2004

PFOA POSITION STATEMENT

FROM: Carpet & Rug Institute Board of Directors

TO: Telomer Work Group

This is a response to your request for the carpet industry's written position statement on PFOA environmental monitoring. As you are aware, this important matter has been discussed at great length among the members of our industry. The unanimous position of the carpet industry is that it would be premature to commence PFOA environmental monitoring at this time. Without a completed risk assessment from the EPA, it is impossible for companies within our industry to begin to formulate a relevant analytical methodology. This absence of the EPA risk assessment is the basis for the adoption of our position. The risk assessment is critical in determining the detection limits required for analytical methodology. In addition, if monitoring were conducted under present conditions, the findings would be open to conjecture and misinterpretation, resulting in undue concern and anxiety.

Please understand that the carpet industry is not opposed to PFOA environmental monitoring. Our only desire is that monitoring be conducted in both a scientifically accurate and environmentally interpretable manner. We will look forward to continuing an open dialogue and working closely with you, other agencies, and organizations to develop and execute such a monitoring program once the risk assessment has been completed.

Thank you for your ongoing consideration.