

To Senator Ginny Lyons Chair, Senate Committee on Health and Welfare,
Senator David Weeks, Vice Chair
Senator Ruth Hardy
Senator Martine Larocque Gulick
Senator Terry Williams

It has come to my attention that the Senate Committee on Health and Welfare will decide this week on the language of S.197. The VVMA, the Animal Health Institute, the Agency of Agriculture, and other industry experts testified before the Senate Committee on Agriculture about PFAS presence in veterinary products. During the initial proceedings, Dr. Kyla Bennett referenced an article suggesting that veterinarians are discontinuing the recommendation of products containing trace amounts of PFAS. However, this assertion does not align with the reality in Vermont.

While we acknowledge the necessity of addressing harmful chemicals in our environment, the wording of the bill leaves ambiguity regarding its impact on veterinary products such as flea and tick collars. It is our understanding that the Senate Committee on Agriculture will recommend that the two sections on pesticides be struck from the bill and I hope you will agree. Our concern lies in the possibility that the categorization of PFAS in veterinary products as 'economic poison' could lead to the removal of these essential prevention products from the market. Such action may inadvertently contribute to increased health issues stemming from tick and flea infestations among companion and farm animals. There are further concerns about the presence of PFAS in aerosolized anesthetics of which there is no alternative on the market. The absence of many of these veterinary products will make the practice of veterinary medicine in Vermont barbaric at best.

To address these concerns, other witnesses have offered definitions that reduce the scope of the bill. If the pesticide sections remain and the definition remains broad, we respectfully request that veterinary products be explicitly exempted from the bill. This exemption should include language ensuring that the section on pesticides does not apply to parasiticides regulated by the United States Environmental Protection Agency under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.). Here is sample language to consider:

"Drugs, biological products, parasiticides, medical devices, or in vitro diagnostics used to treat, or administered to, animals and regulated by the United States Food and Drug Administration under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Sec. 301 et seq.), by the United States Department of Agriculture under the federal Virus-Serum-Toxin Act (21 U.S.C. Sec. 151 et seq.), or by the United States Environmental Protection Agency under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.)."

Thank you for your time and please let me know if you have any questions.

Best regards,
Linda Waite-Simpson
VVMA Executive Director
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