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Anika Adams
Legislative Committee
Vermont State Legislature
[Legislative Address]
Email: AEAdams@leg.state.vt.us

Re: Opposition to VT H.238 – Supporting the Continued Use of PTFE in Medical Devices and Cookware

Dear Ms. Adams,

I am writing to express my strong opposition to the inclusion of fluoropolymers such as polytetrafluoroethylene (PTFE) in the scope of the proposed Vermont Bill H.238. As both a medical device manufacturer and a practicing physician, I have extensive experience with PTFE's critical role in FDA-approved medical applications. Its unique stability, chemical resistance, and biocompatibility make it indispensable in modern medicine.

PTFE in FDA-Approved Medical Devices

PTFE has been routinely used in numerous FDA-approved medical devices for decades. Some of these include:

- **Vascular Grafts (ePTFE Grafts)** – Used in bypass surgeries and arterial replacements.
- **Catheters and Guidewires** – Provides low-friction coatings essential for minimally invasive procedures.
- **Surgical Sutures** – Used for high-performance, non-reactive wound closure.
- **Implantable Meshes** – Essential in hernia repair and reconstructive surgeries.
- **Heart Valve Components** – Used in artificial heart valves for its stability and longevity.
- **Dialysis Tubing** – Ensures reliable performance in kidney dialysis treatments.

These life-saving medical devices are widely accepted as safe and effective, and there are no regulatory plans to phase out PTFE in these applications. The medical community relies on fluoropolymers due to their inert nature, which is fundamental to ensuring patient safety and treatment efficacy.

Broader Environmental Exposure to PTFE

The argument against PTFE in cookware due to environmental contamination is highly disproportionate when considering the vast industrial use of PTFE and similar fluoropolymers in other industries. Sources of PTFE and other PFAS-related environmental exposure include:

- **Aerospace and Automotive Industries** – Used in aircraft components, gaskets, and fuel lines.
- **Electronics** – Found in insulation coatings, semiconductors, and connectors.
- **Textile and Apparel** – Used in weather-resistant clothing, firefighting gear, and performance wear.
- **Industrial Manufacturing** – Applied in chemical-resistant tubing, valves, and seals.

Compared to these industries, PTFE in cookware represents a negligible environmental burden, particularly since PTFE does not dissolve or degrade at normal cooking temperatures. The primary pathways of human PFAS exposure, including through drinking water and industrial contamination, are not relevant to PTFE in cookware.

PTFE Stability and Safety in Cookware

One of the core misconceptions in the debate surrounding PTFE is that it bioaccumulates in the body. This is incorrect. Unlike smaller-chain PFAS chemicals, PTFE is a high-molecular-weight, non-reactive polymer that does not leach into food or water under normal cooking conditions. It is thermally stable and does not dissolve in bodily fluids, making it inherently safe for food contact.

If PTFE is considered safe enough for direct contact with blood, tissues, and critical organs in FDA-approved medical devices, it logically follows that its use in cookware should be equally acceptable.

Addressing the Chinese Study on PTFE and Reproductive Health

Concerns have been raised regarding a study suggesting a link between PTFE exposure and reduced sperm count. However, this study was fundamentally flawed in its design and execution. It lacked control subjects with normal reproductive function, making its conclusions unreliable. Without proper comparative groups, causation cannot be established. Additionally, PTFE does not enter the bloodstream in significant quantities, and the study failed to account for far more prominent sources of PFAS exposure, such as contaminated drinking water, air pollution, and industrial waste.

Conclusion

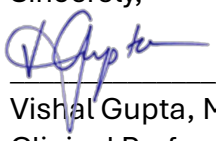
The proposed ban in Vermont's Bill H.238 is a sweeping overreach that fails to differentiate between harmful PFAS chemicals and inert, high-performance fluoropolymers like PTFE.

Banning PTFE from cookware, despite its FDA-approved safety in medical applications, sets a dangerous precedent and ignores established scientific evidence.

I urge the Vermont legislature to reconsider the inclusion of fluoropolymers like PTFE in this legislation and to focus on addressing actual environmental contaminants rather than safe, stable materials that have been in use for decades without harm.

Please feel free to contact me should you require further expert insight into the safety and necessity of PTFE in both the medical and consumer product industries.

Sincerely,



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