



February 27, 2025

The Honorable Chair Sheldon and Members of the House Committee on Environment:

My name is Steve Burns, and I serve as President of a 501(c)(6) called the Cookware Sustainability Alliance (or the CSA).

The mission of the CSA is simple:

- We provide science-based information about the safety of cookware products for consumers and policymakers to make informed decisions.
- Our priority is to educate and advocate, because when it comes to public health, we believe strongly that public policy decisions should be guided by sound science.

We were founded last summer by two of the largest producers of non-stick cookware in the world, and we have since been joined by a third company.

I have to be candid: you didn't see or hear from us before because to the extent that this industry involved itself in policy, whether legislation or regulation, it was almost always for compliance purposes, to make sure the products we made were above everything else, safe.

However, in the past year or two, states began introducing, and in some cases passing and signing into law, bans on a number of products containing "intentionally added PFAS", and the cookware industry knew they had to engage. In some cases, too late, but engage is what we began to do.

Our engagement is simple – and I know that you heard this from Chris Correnti, the President & CEO of AGC America, two days ago. We are here to tell you that there can be vast differences among the over 14,000 PFAS group chemicals, and the chemical we use to produce non-stick cookware – which is called Fluoropolymers – is different and it is safe. I'd like to run through facets about Fluoropolymers for just a moment:

- Fluoropolymers are up to 1000x longer than a PFOA or PFOS molecule, and as a result they pass directly through a human body.

- Fluoropolymers do not bioaccumulate.
- Fluoropolymers are not water soluble, so exposure through drinking water is simply not a concern.
- Fluoropolymers don't have the alkyl groups of hydrogen and oxygen atoms that exist at the end of a PFOA or PFOS chain, which are what binds PFOA and PFOS to organic matter. Because they lack these alkyls groups, Fluoropolymers are inert.
- Fluoropolymers are proven to be non-toxic. And I want to emphasize this point. Fluoropolymers are non-toxic. How do we know this? Besides the independent studies that have shown it (and I am happy to submit those to you as a follow-up), Fluoropolymers have been used for decades to coat pacemakers before they are implanted into a human body. The same is true for stents and catheters. Knowing that the global medical profession using Fluoropolymers specifically in and on medical devices that are implanted in humans, makes it very difficult to imagine that this chemical is harmful in *any* way.
- And everything that I just stated has been published in multiple independent, refereed, scientific journal articles. But why take my word for it? Why take the industry's word?
- Since the 1960's, federal regulations (21 CFR 175.300) have authorized fluoropolymers for use in food contact applications. The **U.S. Food and Drug Administration (USFDA)** specifically tests Fluoropolymers for food contact. In fact, in February 2024, the USFDA *again* determined that PTFE cookware is safe due to "highly polymerized coating bound to the surface of the cookware, showing negligible amounts of PFAS in this coating migrating to food, and polymerized or large molecule PFAS are not absorbed by the human body when ingested."
- The **European Food Safety Authority** found that due to its molecular size, PTFE will not likely be absorbed through the gastrointestinal barrier (2016; reaffirmed in 2020).
- The **German Federal Institute for Risk Assessment (BfR)** found that "the quantities of these substances (PTFE) which can potentially be released if the dishes are used for their intended purpose are so low that no risk to health should be assumed" and "It is still safe to health if minute particles are released from scratched coatings and swallowed when eating. As PTFE is inert, these particles are not digested and are excreted from the body unchanged." (Dec. 2018)

- The **Swiss Consumer Federation** confirmed that modern manufacturing processes for nonstick pans eliminate perfluorooctanoic acid (PFOA) and bind other compounds so firmly that no traces of PFOA have been found in final products. (March 2019)
- And besides these trusted government bodies, trusted advocacy groups have also weighed in.
- The **American Cancer Society** writes, “In most cases, the American Cancer Society does not determine if something causes cancer. Instead, we look to other respected organizations that classify potentially cancer-causing exposures. While some PFAS can be used in making some non-stick cookware coatings, they are joined together in large molecules (polymerized) and are tightly bound to the cookware, according to the FDA.”
- The **Environmental Working Group** – the EWG, who are a very respected environmental organization – writes this about Cookware on their website: “...even though it’s always been the poster child for PFAS exposure, this cookware is not anticipated to be a major source of exposure.”
- I’ve focused on the science to ask you to view fluoropolymers differently, because this discussion underway is about PFAS and human health. I would be remiss not to at least mention the economic impacts of forcing consumers throughout Vermont to change their spending habits in the kitchen and beyond. Non-stick cookware is used not just in homes, but in just about every restaurant, on every fast food burger grill, to coat every wok in an Asian Restaurant, every large grill in a local diner or burrito restaurant.
- The economic impact that comes with a policy signal – which a nonstick cookware ban would surely be – is that all of these would need to be replaced. That’s a lot of pots and pans and grills. That’s a lot of forced purchases of entirely new lines of kitchenware and restaurant materials.

- To summarize, fluoropolymers are non-toxic. They simply cannot enter the human blood stream or bind with organic matter. They do not bioaccumulate. They are inert. Yes, they are categorized as a PFAS chemical. But they look and act very differently. **They are safe, and we'd ask you to take the following proposed amendment into consideration in your definition of PFAS:**

9 V.S.A. § 2494e (13) "Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.

(13a) Fluoropolymers are NOT a PFAS chemical of concern and are exempted

Thank you for your consideration.

Sincerely,

Stephen D. Burns

Cookware Sustainability Alliance