



Honorable David Bennett
Chair, House Environment and Natural Resources Committee
Rhode Island General Assembly
82 Smith Street
Providence, RI 02903

RE: Support- RI H 6059 – Cookware Exemption

April 9, 2025

Dear Chair Bennett and Members of the House Environment and Natural Resources Committee,

The American Chemistry Council (ACC) is a national trade association representing chemicals and plastics manufacturers in the United States, including member companies in Rhode Island. Our members are committed to the safety of their products and to the protection of public health.

Thank you for the opportunity to provide comments in support of **HB 6059**. This bill would amend the Consumer PFAS Ban of 2024 to exempt certain cookware that contains PFAS authorized by the FDA as safe for consumer contact. ACC supports HB 6059 for the following reasons:

The fluoropolymers used in cookware are “PFAS,” but they are fundamentally different compounds from the chemicals that have motivated concerns about PFAS.

This bill recognizes that the term “PFAS” encompasses a diverse group of compounds with very different chemical and physical, and therefore biological, properties. The term “PFAS” does not inform whether a substance is potentially harmful or not. The term simply means that molecules covered by the term share a similar structural trait. It does not speak to characteristics such as toxicity, environmental fate, and bioavailability among diverse PFAS chemistries.

Fluoropolymers, including PTFE, meet internationally accepted criteria to be considered polymers of low concern (PLC) to human health and the environment. In short, fluoropolymers possess physical and chemical attributes that would not raise concerns about potential hazard traits. The PLC criteria include evaluation of:

- Molecular structure and elemental composition;
- Molecular weight and the consistency of molecule size;
- Particle size;
- Low molecular weight residuals that might leach from the polymer;
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- Electrical charge;
- Presence and nature of reactive functional groups;
- Resistance to physical, chemical, and biological transformation; and
- Resistance to heat and other environmental stressors.

Importantly, fluoropolymers are neither bioavailable nor bioaccumulative and do not transform into long-chain non-polymeric PFAS like PFOA and PFOS in the environment.

To summarize, we support this bill that provides an exemption for fluoropolymer coated nonstick cookware from the Consumer PFAS Ban of 2024 because of their low-risk profile.

- Fluoropolymers are non-toxic. They have a decades-long history of safe use, including in the healthcare industry where they are used on medical implantation devices such as pacemakers and catheters.
- Fluoropolymers are not water-soluble and potential exposure through drinking water is not a concern.
- Fluoropolymers are highly stable and are not shown to degrade under normal conditions of use. They do not bioaccumulate.
- Fluoropolymers have been deemed safe for use in food contact surfaces by the United States Food & Drug Administration (USFDA), by the European Food Safety Authority (EFSA), as well as regulators in Germany and France.

Based on established science, the compounds in fluoropolymer coated nonstick cookware do *not* endanger human health and safety.

Thank you for this opportunity to provide comments on HB 6059. If you have questions, please contact me at Margaret.Gorman@americanchemistry.com.

Sincerely,



Margaret M. Gorman
Senior Director, Northeast Region American Chemistry Council

