

04/17/24

RE: H3911A7 Amendment

Members of the House Environment and Natural Resources Finance and Policy Committee,

Medical Alley represents a global network of more than 800 leading health technology and care companies including representation from all corners of the state of Minnesota. Our mission is to activate and amplify healthcare transformation.

Recognized worldwide as a leader in healthcare innovation, Minnesota sets a standard for excellence – impacting local communities and influencing global health outcomes and advancements. With access, affordability, and quality as top priorities, Medical Alley and our partners are committed to developing solutions which drive meaningful change and save lives.

Since our founding in 1984, Medical Alley has been committed to advancing innovation while protecting the environment. Alongside our partners, we embrace the responsibility of minimizing environmental impacts to ensure a healthy and sustainable future for all Minnesotans.

As we balance environmental stewardship with protecting access to healthcare, Medical Alley has concerns about the impact of the [H3911A7 Amendment](#).

Last year's PFAS regulation law made an [exemption](#) under the testing requirements and prohibition sections for “a prosthetic or orthotic device or to any product that is a medical device or drug or that is otherwise used in a medical setting or in medical applications regulated by the United States Food and Drug Administration.” This law recognized the critical role of PFAS in many medical devices, drugs, and medical products.

It is important to note that the PFAS categories of concern tied to environmental contamination and bioaccumulation are not what are used in medical devices and technology. Targeting the concerning water-soluble PFAS categories and excluding the non-water soluble PFAS – polymers such as fluoropolymers and perfluoropolymers – would ensure this legislation is consistent with the 2023 law.

In order to remain consistent with the 2023 law, Medical Alley would suggest amending the language in the following way:

- Adding the following sentence: *Entities manufacturing products referenced in 2023, Ch. 60, Sec. 21, Subd. 8(b) will not be subject to the fees established as a result of the report.*



Medical Alley believes such an approach would properly address Representative Lee's concerns about the cost of treating and disposing of PFAS without penalizing those who are using non-water soluble PFAS to develop life-saving medical devices and drugs.

Sincerely,

A handwritten signature in black ink that reads 'Peter Glessing'. The signature is written in a cursive style and is centered within a light gray rectangular box.

Peter Glessing
Senior Director of Policy and Advocacy
Medical Alley