

## June 29, 2023

## Sterigenics Statement on Comments to EPA NESHAP and FIFRA Proposals

Sterigenics respects, supports, and shares EPA's commitment to employee and community safety, so much so that the Company has taken proactive steps to enhance its EtO sterilization facilities and the technologies deployed at them even before new regulations were established. Since 2018, Sterigenics has – on its own initiative and in advance of the release of the proposed new standards – invested over \$50 million to enhance its emission controls and plans to spend additional tens of millions of dollars over the next several years.

But Sterigenics and numerous experts do not believe the proposed rules use the best available science to estimate the risks posed by EtO sterilization operations, including new studies by six state health agencies all of which found no increases in cancers in communities surrounding EtO sterilization and manufacturing facilities. Moreover, Sterigenics' years of experience in operating and upgrading EtO facilities strongly suggests that many of the EPA's proposed measures would be impractical, especially for existing facilities, and challenging to implement at most facilities in the proposed timeframes.

Importantly, the proposed rules pose a risk to the U.S. healthcare system. The new requirements under the rules would significantly reduce this country's already-strained EtO sterilization capacity, jeopardizing the availability of sterilized medical products and putting American lives at risk.

In light of the indispensability of EtO sterilization to the U.S. healthcare system, it is imperative that the EPA's final rules appropriately reflect the totality of the requirements of the Clean Air Act and FIFRA, including a more complete and balanced cost-benefit analysis reflecting important impacts such as reduced availability of medical products. Sterigenics hopes that its comments will serve as the basis for a fruitful discussion among domain experts in the EPA, FDA and Office of Management and Budget and help lead to the adjustments necessary to achieve the shared commitment to safety for patients, employees, and the communities in which EtO sterilization facilities operate.

## **Cautionary Note Regarding Forward-Looking Statements**

This statement contains forward-looking statements that reflect management's expectations about future events and the Company's operating plans and performance and speaks only as of the date hereof. These forward-looking statements are subject to various risks and uncertainties. For information on certain factors that could cause actual events or results to differ materially from our expectations, please refer to the Company's filings with the SEC, such as its annual and quarterly reports. The Company undertakes no obligation to publicly update or revise these forward-looking statements, except as otherwise required by law.