



January 15, 2019

Christina Shupe, Executive Officer  
Department of Industrial Relations  
Division of Occupational Health and Safety  
1515 Clay St., Suite 1901  
Oakland, California 94612

**Subject: Occupational Exposure to Surgical Smoke Plume**

Dear Ms. Shupe,

The Advanced Medical Technology Association (AdvaMed), the national association of medical technology providers, supports adoption of a surgical smoke evacuation standard that will protect patients and workers.

All procedures that generate smoke create the risk of harm to patients and to workers, including nurses, surgeons and countless others that may also be exposed. Adoption of a surgical smoke evacuation standard should apply equally to all surgical centers as the hazards to patient safety and worker safety exist wherever surgical smoke occurs, regardless of whether it is an outpatient setting or not. Most, if not all, hospitals and ambulatory surgical centers already have smoke evacuation equipment available for use in their operating rooms. A new smoke evacuation standard should not create substantial costs for health care.

Surgical smoke evacuation can be accomplished by implementing hospital policies requiring evacuation for all planned procedures likely to generate smoke. Simply requiring use of the equipment designed to capture that smoke should be a priority over listing devices likely to cause smoke which may create an unnecessarily complicated rule. A basic requirement to use surgical smoke evacuation equipment will protect health care workers and patients.

We urge the division to adopt a smoke evacuation standard that applies regardless of surgical setting to protect patient and worker safety.

Please contact me if you have any questions.

Sincerely,

Fielding Greaves  
Director, State Government & Regional Affairs