

**Comments to ECHA –****proposal restricting PFAS**

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European Chemicals Agency  
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**Comments from the Swedish Food Agency regarding the Reach Annex XV report – Proposal for restricting Per- and polyfluoroalkyl substances (PFAS)**

The Swedish Food Agency welcomes the Annex XV report on the restriction of per- and polyfluoroalkyl substances (PFAS) and supports to the proposed Annex XVII entry put forward by the authors of the Annex XV report.

Food and drinking water are today the main exposure sources of PFAS for humans and many European citizens exceed the health based tolerable weekly intake via food and drinking water. Restrictions of PFOA and PFOS the last decade have gained success leading to reduced levels in both food and environment. Thus, the Swedish Food Agency is of the opinion that a broad restriction is the most rational and efficient way to manage this large group of substances given the high risks associated with its problematic properties and extensive use area.

The challenges with recontamination in material recycling would be significantly alleviated through a broad restriction as compared to a targeted alternative. The Swedish Food Agency has taken notice of this being an issue of concern in the parallel restriction process of PFHxA and the possible contamination of PFHxA in for example food contact material (FCM) through recycling. This, since non-FCM paper and cardboard are not covered by the targeted PFHxA-restriction being proposed by the Commission. The Swedish Food Agency agrees also on the benefits of a restriction regarding controlling PFAS in imported articles.

The Swedish Food Agency shares the rationale behind the proposed scope of the restriction, *i.e.* simultaneously restricting all production and use (with some derogations) of an entire group of substances. The main reasons why the measures put forward within the chemical control system must aim at limiting emissions of all PFAS to a minimum are:

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risks of PFAS-emissions are of non-threshold nature, i.e., the intrinsic properties of PFAS, foremost their persistence and mobility in combination with negative effects on human health and environment, will inevitably lead to rising exposure levels in all biota and negative effects.

when PFAS is spread in the environment they end up in food and drinking water, which are the main sources of PFAS for humans. PFAS exposures in large population groups exceeds what at present is defined as a safe level, i.e., tolerable weekly intake (TWI). Exposures to multiple PFAS cannot, even to date, be avoided and combination effects are expected.

remediation of PFAS-polluted land and water is technically challenging or in some instances not even possible as well as extremely costly to society, not only in monetary terms but also regarding depletion of material and energy resources.

there are alternatives to PFAS in many applications, and restriction *per se* is a very strong incentive to stimulate further development of alternatives;

a complete PFAS ban will most likely be economically beneficial to society in the long run, although costly in the short term and related to negative consequences for individual companies and in some extent for the society.