



On behalf of:



To: Member States Competent Authorities developing the EU-wide restriction on PFAS – The Netherlands, Germany, Denmark, Norway, Sweden

CC: European Chemicals Agency (ECHA)

Brussels, 2nd June 2021

Re: Request for a meeting to present civil society study on PFAS presence in single use food packaging and tableware across Europe

Dear Competent authorities,

We, the undersigned organisations, are writing to you in order to inform you about the release of our **joint study about the presence of per- and polyfluorinated compounds in food contact articles across Europe, and seek an exchange with you to present its findings and discuss them in relation to your ongoing preparations for a Europe-wide restriction on all non-essential uses of such compounds.**

In our study "[Throwaway Packaging, Forever Chemicals: European-wide survey of PFAS in disposable food packaging and tableware](#)", single use paper, board and moulded plant fibre food packaging and tableware were sampled in six countries: Denmark, France, Germany, the Czech Republic, the Netherlands and the United Kingdom. The results suggest a wide presence and use of PFAS substances in such items.

In total, 99 samples were collected from takeaways, supermarkets and e-shops between May and December 2020. 42 of these samples were sent to a certified laboratory for analysis of their Total Organic Fluorine (TOF) content as well as the targeted analysis of 55 individual PFAS compounds. 17 of the samples were also selected for investigation of potential disruption of the thyroid activity.

Our findings include the following:

- Based on the simple oil beading test, 38 out of the 99 collected samples (38%) were suspected to have been treated with PFAS chemicals in order to achieve oil repellency.
- Out of the 42 samples selected for chemical analysis, 32 (76%) showed intentional treatment with PFAS.
- In some samples, the total organic fluorine (TOF) levels measured were up to 60 times higher than the indicator value set by the Danish Veterinary and Food Administration to help companies assess whether organic fluorinated substances have been added to paper and board food packaging or not.

- Traces of PFAS were detected in all of the 42 samples selected for lab analysis, even samples not intentionally treated with PFAS.
- 99% of the organic fluorine present in selected samples were not captured by the laboratory's compound-specific analysis of 55 PFAS, making it impossible to identify the present PFAS compounds with certainty.
- The PFAS present in some of the samples analysed showed the potential to impair thyroid activity, warranting further investigation of potential endocrine disrupting properties.
- The highest concentrations were consistently found in moulded plant fibre products, which are often advertised as biodegradable or compostable and are getting increasingly popular to replace single use plastic items.
- In Denmark, none of the sampled McDonald's French fries' bags exhibited any PFAS treatment – in contrast to samples of the exact same items in other countries, for instance the Czech Republic and the United Kingdom. This shows the success of the Danish regulatory effort on PFAS and the related swift adaptation from market players to find safe substitutes. However, this also highlights the lack of harmonised protection for citizens across the Europe.

Because all PFAS compounds are very persistent, their widespread presence in disposable items produced in high volumes and with a very high turnover rate, our findings are very worrying. They contribute to an accelerating trend of PFAS accumulation in our environment, which endangers human health and wildlife as well as the achievement of a clean circular economy.

In our view, PFAS treatment in food packaging and tableware is a typical illustration of uses that are not necessary and can be substituted – either through safer treatment of disposable packaging or through the mainstreaming of collection and reuse systems of durable food containers in the food distribution sector.

In the context of your preparatory work for the development of a Europe-wide restriction on all the non-essential uses of PFAS, we urge you to include the full range of PFAS chemicals, including fluorinated polymers, and to guarantee that disposable food packaging and tableware are covered within the scope of the future restriction.

We would welcome the opportunity to present our findings more in details and hold an exchange with you on their basis. Therefore, we would like to invite you to an online meeting in June or July, at your best convenience.

We thank you for considering our findings and our request for a meeting, and we look forward to exchanging with you.

Yours sincerely,



Genon K. Jensen
Executive Director
Health and Environment Alliance (HEAL)



Jindrich Petrlík
Executive Director, Toxics and Waste Programme
Arnika



Michael Warhurst
Executive Director
CHEM Trust



Pamela Miller
Co-Chairs



Tadesse Amara

International Pollutants Elimination Network (IPEN)

On behalf of:

BUND – Friends of the Earth Germany

Forbrugerrådet Tænk Kemi - Danish Consumer Council

Générations Futures

Tegengif

Attachments:

- [Full report, Throwaway Packaging, Forever Chemicals: European-wide survey of PFAS in disposable food packaging and tableware](#)
- [Executive Summary with recommendations](#)