

From: [REDACTED]
Sent: mercredi 2 juin 2021 10:58
To: CAB TIMMERMANS CONTACT; CAB BRETON CONTACT; CAB KYRIAKIDES CONTACT; CAB SINKEVICIUS CONTACT
Cc: [REDACTED]
Subject: Civil society findings of widespread presence of harmful chemicals PFAS widespread in food packaging and request for a meeting
Attachments: 2021.06.PFAS_Letter-EU-Commissioners.pdf

Dear Vice-President Timmermans,
Dear Commissioners Kyriakides, Sinkevicius, Breton,

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 (PFAS) in food contact articles across Europe**, and seek an exchange with you about its findings in relation to the European Commission action under the EU Green Deal, and more particularly under the EU Chemicals Strategy for Sustainability (CSS).

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. It suggests a **wide presence and use of PFAS substances – often referred to ‘forever chemicals’ due to their high persistence - in such items**. It also shows that **regulation is the most effective way of ensuring that harmful chemicals are not used in food packaging**.

Our findings include the following:

- **PFAS are widely used in disposable food packaging and tableware in Europe**. This includes food packaging from popular fast-food chains and restaurants.
- **Traces of PFAS were detected in all samples selected for lab analysis demonstrating the pervasive contamination of both production and supply chains for paper and board food packaging with PFAS chemicals, which is a barrier to a clean and safe circular economy**.
- **Intentional PFAS treatment was confirmed in 32 out of the 42 samples sent to the laboratory for analysis**.
- **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**.
- **The PFAS present in some of the samples analysed showed the potential to impair thyroid activity, warranting further investigation of potential endocrine disrupting properties**.

- In Denmark, which is the only country that had introduced a ban on PFAS in food packaging, 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 is of great concern. Our findings confirm 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. This is in contrast to the objectives set in the EU Green Deal and the CSS, which includes specific actions to address PFAS contamination in Europe.

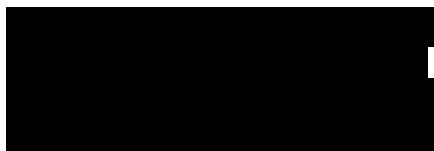
In our view, PFAS treatment in food packaging and tableware is a typical illustration of uses that are not necessary and can be substituted – either through safer treatment of disposable packaging or through the mainstreaming of collection and reuse systems of durable food containers in the food distribution sector. This fits perfectly in the ongoing Commission reflections about criteria for essential/non-essential uses as well as safe-and-sustainable-by-design chemicals.

In the context of the Commission's commitments under the EU Chemicals Strategy for Sustainability, we urge you to support the swift preparation of the REACH restriction on all non-essential uses of PFAS and to proceed swiftly with the development of the promised criteria for essential/non-essential uses as well as for safe-and-sustainable-by-design chemicals.

We would therefore like to request an online meeting with you in order to present our findings to you and to have an exchange about their important implications.

We thank you for considering our request and we look forward to exchanging with you at your earliest convenience.

Yours sincerely,

 **Health and Environment Alliance (HEAL)**
Toxics and Waste Programme) Arnika
CHEM Trust
, International Pollutants Elimination Network (IPEN)

On behalf of:
BUND – Friends of the Earth Germany
Forbrugerrådet Tænk Kemi - Danish Consumer Council
Générations Futures
Tegengif

Health & Environment Alliance (HEAL)

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