

Questionnaire PFAS used for food and feed packaging and non-food packaging

Background

The authorities of five EU/EEA Member States are preparing a joint REACH restriction proposal on the manufacture and use of a wide range of per- and polyfluoroalkyl substances (PFAS). A public call for evidence took place which ended in July 2020 and generated some information. Responding to this questionnaire is a second opportunity for stakeholders to contribute to the restriction process and influence its outcome.

The five countries are basing their proposal on the high persistence of PFAS in the environment. The scope of the proposal is much broader than has previously been associated with PFAS in that PFAS are defined as substances that contain at least one aliphatic -CF₂- or -CF₃ element. As such, the proposal will include many sectors of industry, and substances not previously considered as PFAS.

The restriction proposal is expected to be submitted to the European Chemical Agency (ECHA) in the next two years with the aim of the restriction entering into force in 2025.

We are therefore gathering information to ensure the market and potential impacts of a restriction are described as accurately as possible. Specifically, we are gathering information on PFAS that are used in food contact materials and alternatives to PFAS. Some information has already been submitted through an earlier call for evidence in 2020, but further data is needed.

We would therefore be grateful if you could complete this questionnaire and return to 5.1.2e @exponent.com and 5.1.2e @emrc.co.u.uk by November 13th 2020.

Notes

The region under consideration

The restriction will focus on activities linked to the European Union (EU) and European Economic Area (EEA).

The EU contains 27 countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

The EEA contains the EU27 and three further countries: Iceland, Liechtenstein and Norway.

The United Kingdom (UK) left the EU in 2020. Please indicate whether any data that supply includes the UK.

Alternatives

We are interested in all alternatives whether they are:

- Direct replacements for PFAS ('drop-in' substitutes)
- Replacements of a broadly similar nature to PFAS, but requiring changes in technology
- Based on different approaches for providing the same service.

Possible restriction of PFAS: Food contact materials

1. Please fill in the following information.

Contact name	5.1.2e
Role in organisation	
Name of organisation	5.1.1c
Preferred contact phone number	5.1.2e
Email address	5.1.2e@5.1.1c.com
Location of organisation	
Main activity of organisation (manufacture/import/distribution)	Industrial user
Are you willing to be contacted again to further discuss the proposed PFAS restriction?	yes

2. Please briefly describe your or your members' activities that use PFAS (based on the definition of PFAS in the introduction to this questionnaire).

Function	Application and PFAS used (specify food or non-food)
Surface treatments for water resistance or grease-repellence	
Colourants, inks	
Other applications of PFAS	5.1.1c

3. Please briefly describe your or your members' activities that use alternatives to PFAS. (see note in the introduction regarding the different types of alternative of interest).

Function	Application and PFAS used (specify food or non-food)
Surface treatments for water resistance or grease-repellence	
Colourants, inks	
Other applications of PFAS	5.1.1c

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4. Which specific PFAS do you use (by application), and in what quantities? 'Quantity' is ideally expressed as tonnes or kg of PFAS, but if that is not available, quantities of product sold would be useful to provide us with an estimate of the quantity of PFAS used.



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PFAS	Quantity of each PFAS used and application (specify food or non-food)
<i>Please name each PFAS you use in this column</i>	<i>Please enter quantity used with units and state application (e.g. inks in food packaging)</i>
<i>Add additional rows if necessary</i>	

5. If you use PFAS substitutes or are aware of them, what are they, what quantity are they used in and what do you use them for?

PFAS-substitute	Quantity of each PFAS-substitute used and application
<i>No known substitutes</i>	5.1.1c
<i>Add additional rows if necessary</i>	

6. What are the advantages of using PFAS? Please provide quantitative information if possible. Factors may include cost, efficiency, safety, etc. Data on costs are particularly useful.

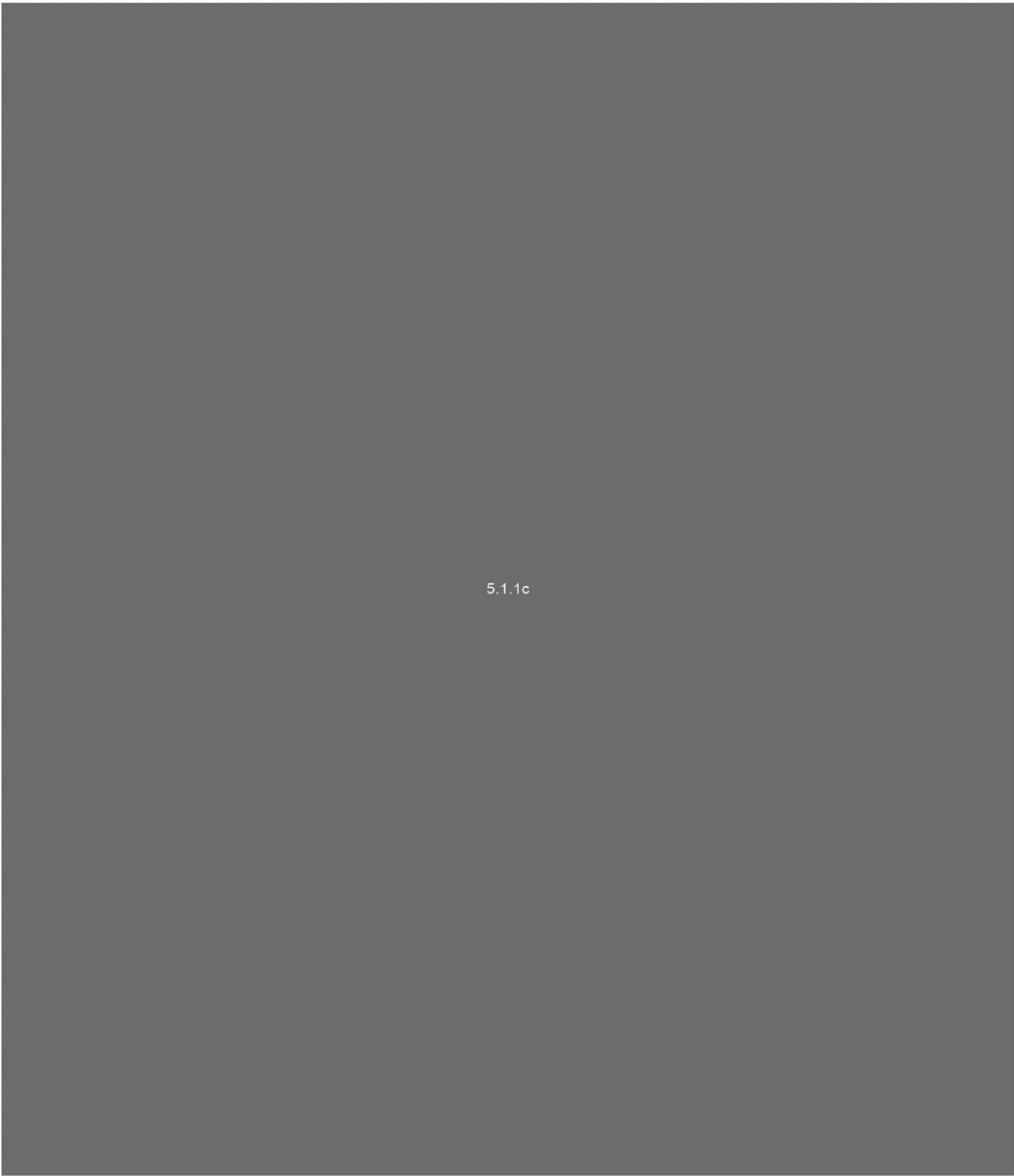
Function	Advantages of using PFAS (specify food or non-food)
Surface treatments for water resistance or grease-repellence	

5.1.1c



Possible restriction of PFAS: Food contact materials

Colourants, inks	
Other applications of PFAS	5.1.1c



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Possible restriction of PFAS: Food contact materials

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7. What are the advantages of using alternatives to PFAS compared to PFAS? Please provide quantitative information if possible. Factors may include cost, efficiency, safety, etc. Data on costs and availability for widespread use in the market are particularly useful. Please note that further detailed information on costs is requested in Question 11.

Function	Advantages of using alternatives to PFAS (specify food or non-food)
Surface treatments for water resistance or grease-repellence	
Colourants, inks	
Other applications of PFAS	See question 9

8. How do you predict demand for PFAS on the **European** market to change over the next 10 years for the following applications in the absence of a Restriction? Please give reasons for your forecasts of change.

Function	Probable future trend, and reasons (specify food or non-food)
Surface treatments for water resistance or grease-repellence	
Colourants, inks	
Other applications of PFAS	5.1.1c

9. What is your or your members' most likely response to a REACH restriction on PFAS?
Please add additional rows if you wish to provide data on more than one concentration limit (e.g. if you wish to provide data on a concentration limit that is technically feasible and one that is sufficient to address intentional use).

	Ranking of likely responses to a restriction: 1 = most likely, 2 = likely, 3 = potentially, 4 = unlikely, 5 = non-viable			
Function	Chemical substitution	Alternative technique	Discontinue PFAS-dependent operations	Operations would not be affected, i.e. business as usual
Surface treatments for water resistance or grease-repellence				
Colourants, inks				
Other applications of PFAS	4-5	4-5	1-2	NA

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10. Please provide a break-down of the necessary steps and indicative time to complete the necessary changes to your process, justifying the necessary transition period (e.g. time required for R&D, product testing, certification (legal, type testing.), and commercialisation). **Please specify food or non-food.**

Function	Necessary transition period (months)	List the steps to be undertaken	Comments on how far advanced this process is, and likelihood of success
Surface treatments for water resistance or grease-repellence			
Colourants, inks			
Other applications of PFAS			

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11. Can you provide estimates of the costs that might be incurred by your company or members from a potential REACH restriction of PFAS for your business? **Please specify food or non-food.**

Function	One-off costs (e.g. R&D and investments)	Annual recurring costs (e.g. production costs and testing costs)	Other (please specify)
Surface treatments for water resistance or grease-repellence			
Colourants, inks			
Other applications of PFAS			

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12. Can you provide a brief explanation of other potential impacts to your company, members and/or your customers from a potential REACH restriction? For example: non-compliance with specific legislation; cleaning requirements, durability of equipment, changes in energy efficiency, etc.

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Socioeconomic Assessment

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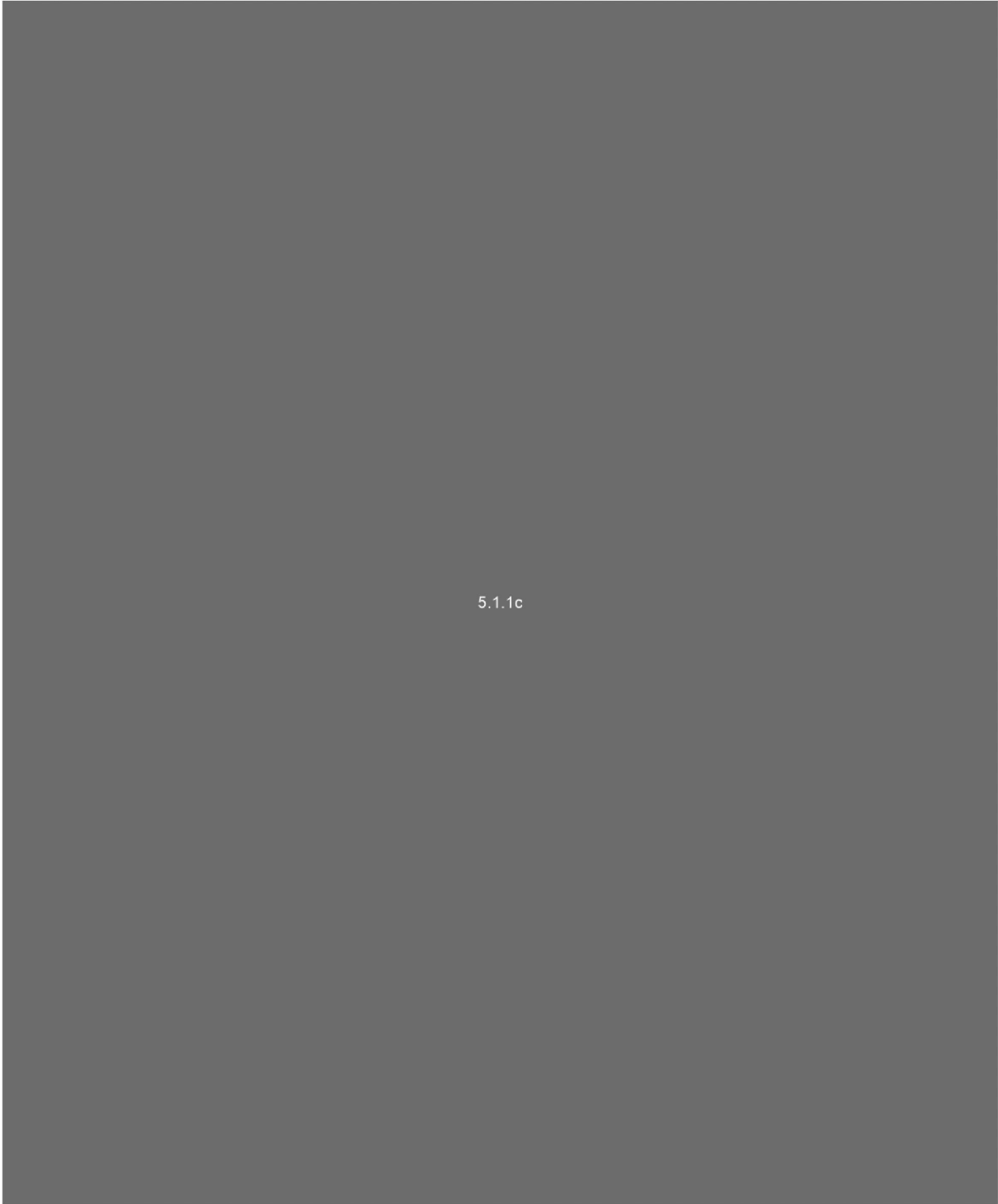
- Technical Applications

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- Supporting Leading Institutions
- Employment
- Reinvestment

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13. Do you have any other relevant information related to a restriction on the use of these PFAS?

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-----END OF QUESTIONNAIRE-----