THE PACKAGING FORUM

Packaging Forum: Poly-fluoroalkyl substances (PFAS) Position Statement

Background

The Packaging Forum (PF) initiated a technical advisory group to determine the PF position on PFAS in food-contact packaging and determine, if possible, a pathway forward. This position has been developed from the recommendation of the PFAS Technical Advisory Group Final Report, October 22, completed by Kim Renshaw on behalf of the Packaging Forum as technical lead of the project. This is available on the Packaging Forum Members Portal.

Position

Evidence is mounting to suggest that the action required to prevent further harm from per and poly-fluoroalkyl substances (PFAS), needs to be bold and swift. There is significant work and research being undertaken globally to phase these chemicals out of food packaging. Given the need to limit further harm action needs to be taken as quickly as possible.

The Packaging Forums position is industry should work together to voluntarily phase out all intentionally added PFAS from food packaging.

A proactive approach requires members commit voluntarily to:

1. Commence investigation into their own supply chains immediately to ascertain whether they are affected by the phase out.

2. Begin running down affected stock lines and replacing with alternative materials as soon as practicable.

3. Cease procuring affected packaging (materials with intentionally added PFAS) by 31 December 2023.

4. Complete run down of affected stock lines by 30 December 2024.

Packaging Forum acknowledges the presence of low levels of Total Fluorine inadvertently present in all starter materials for packaging, due to its ubiquitous nature. Stakeholders should continue to monitor global guidance on non-intentionally added and background levels of Total Fluorine as new evidence emerges.

Industry has the capacity to implement a solution. The PF would support the development of national standards and screening protocols and the PF would look to work with stakeholders and regulators to support this development.

Rob Langford

CEO, Packaging Forum

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Definitions

Packaging Material used for the containment, protection, marketing, or handling of product. Includes primary, secondary and tertiary/freight packaging in both consumer and industrial packaging applications.

Packaging level Identifies the hierarchical level of the packaging assembly, i.e. primary, secondary or tertiary.

Primary packaging, also known as consumer or retail packaging, refers to the layer/s that contain and protect individual product units up to the point of sale (e.g. bag, bottle, jar, box etc.) and that are removed for use. Primary packaging also includes any packaging given to consumers at the point of retail sales (e.g. retail bag, tissue paper etc.) as well as packaging delivered to consumers with online sales (e.g. bag, cushioning, box etc.).

Secondary packaging is additional to the primary packaging and is used to protect and collate individual product units during storage, transport and distribution. This may include shelf-ready packaging (SRP), also known as retail-ready packaging (RRP) or counter- top display units (CDUs), containing multiple product units and used for retail display.

Tertiary packaging is used in the protection and shipping of a product. This type of packaging is also known as distribution packaging, transport packaging and business-to-business (B2B packaging). It consists of packaging and components such as cardboard cartons, pallets, slip sheets, stretch wrap, strapping and any labels.

PFAS Per- and polyfluoroalkyl substances, including both long and short chain.

Intentionally added PFAS specifically refers to packaging, based on research and investigation confirms PFAs has been added directly or as a component of an added material, with the exception of recycled paperboard, resulting in a total Fluorine level >100ppm via Combustion Ion Chromatography testing or a similar Total Fluorine method.

Paper and paperboard is a group term related to papers (including multi-ply papers) that have been manufactured specifically for packaging purposes. Paper is both an input into paperboard manufacturing and can be a packaging product in its own right.

Ink are chemicals used for the printing of any information on packaging.