

Perfluoroalkyl and polyfluoroalkyl substances (PFAS)

Over the last year this large group of chemicals was covered in several update mails and again we need to share background on the latest developments mainly in Denmark and Germany.

The Danish PFAS ban is now in place since the 1st July.

<https://www.retsinformation.dk/eli/ta/2020/681>

The “Order on food contact materials and on provisions for penalties for breaches of related EU legislation” (Order No 681 - 25 May 2020), contains in Chapter 3:

“Paper and cardboard food contact materials using per- and polyfluorinated substances (PFAS) must not be placed on the market.

By way of derogation, paper and cardboard food contact materials using per- and polyfluorinated substances (PFAS) may be placed on the market provided that a functional barrier is used, avoiding the migration of the substances in the food.”

The text remains however vague. Is this measure applicable to all present PFAS substances and which limits will be applied for enforcement?

An additional guidance note is now available from the Danish Veterinary & Food Administration.

<https://www.foedevarestyrelsen.dk/english/SiteCollectionDocuments/Kemi%20og%20foedevarekvalitet/UK-Fact-sheet-fluorinated-substances.pdf>

The note explains the use of PFAS can be direct and indirect. “Indirect use is, for example, the addition of these substances to paper and board from inks or the use of recycled paper and board material.”

The Administration established an indicator value of 20 microgram organic fluorine per gram of paper.

“This corresponds to 10 microgram organic fluorine per square decimetre of paper, when the paper has a weight of 0,5 gram per square decimetre. A content below the indicator value is considered as unintentional background pollution. This means companies can use this value to ensure that organic fluorinated substances have not been added to the paper.

In Germany a biomonitoring study by the Environment Agency (Umwelt Bundesamt UBA),

looking after 12 per- and polyfluorinated substances in blood plasma samples of children and adolescents (3-17 years old) found high average levels of PFOS, PFOA and perfluorohexane sulfonic acid (PFHxS).

<https://www.umweltbundesamt.de/en/press/pressinformation/pfas-excessively-high-in-blood-of-children>

PFOA was found in 86% of the 1109 examined blood plasma samples and 21,1% of the samples exceed the HBM 1 assessment value defined by the Human Biomonitoring Commission.

100 % of the children in the survey were exposed to PFOS, and 7,1% were above the HBM 1 value.

The publication stipulates well the multiple exposure pathways, definitely not only related to packaging.

There is no doubt the UBA study will further strengthen the intentions to ban PFAS at the EU level.

In the press statement is mentioned how UBA is working with the authorities from Germany, the Netherlands, Denmark, Sweden and Norway to develop an extensive EU-wide ban for the entire substance group.

We were informed by FFI the study has in between been picked up by the non-governmental organisation Deutsche Umwelthilfe.

Food Safety information sharing in the supply chain

As reported (see update 23/04), information sharing is currently an important topic covered in many platforms, with a serious project in the Packaging Ink Joint Industry Taskforce (PIJITF).

Also in the so-called Cross Industry Group information sharing has been an important discussion item.

This Cross Industry Group was established in 2017 to provide a broad industry input in the review process of the EU food contact legislation. Nearly all professional associations representing food contact activities



(including ECMA) are involved and the group also includes the association for the food contact additives as well as the food industry.

Within one of the working groups of this broad platform a document has now been finalised on the Risk Assessment and Risk Management high level principles for substances. (See annexed document)

The document stipulates how all substances must be risk assessed and risk managed and how every operator has the responsibility to know what assessment / information is required.

Best practices to obtain information need to be applied and each FCM sector is encouraged to define what information should be transmitted up and down the supply chain. Out of the PIJITF project and the Cross Industry principles, the ECMA Food Safety Committee will develop appropriate recommendations for the membership on information sharing.

Carbon Footprint

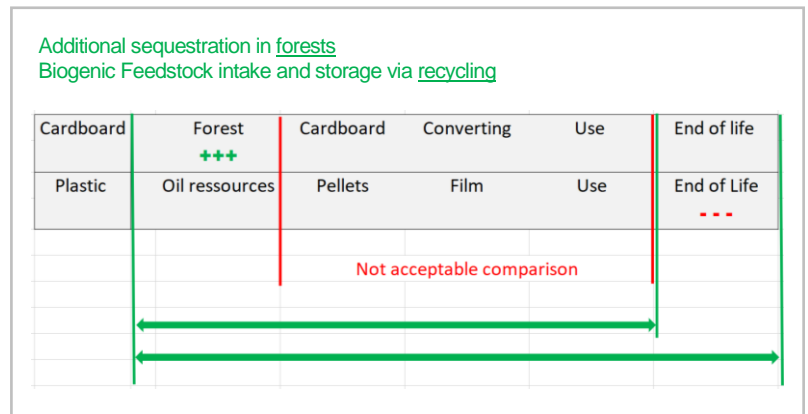
Pro Carton confirmed the new carbon footprint data (See update 24/04) are now accepted by the influential European databases Gabi and Ecoinvent and how 326 kg CO₂ /Ton will be included for cartons in the next updates! This is a very positive development as those databases are typically used by the EU policy makers and the large customers.

Although comparisons between materials are difficult because carbon footprint calculations are taking in account the specificities of the different industries and their processes, it needs to be understood the used boundaries are critical and can put our sector (taking in account the weight difference between materials) in a negative position.

Still in recent meetings CF data for cardboard and plastic packaging were presented respectively in the range of 1700 kg CO₂ versus 2400-3250 kg CO₂.

This is due to a comparison between the red lines in the indicative figure aside, leaving out for our sector the favourable intake and storage of biogenic CO₂.

CF footprint data for boundaries corresponding to the green arrows offer a fairer view.



Food safety events

Nearly all food safety conferences were turned into web events or were rescheduled.

An updated overview:

1-2 September (Online) / Same seminar on the 13-14 October (Online)

PTS Recyclability of paper & board based packaging.

<https://www.ptspaper.com/>

3 September (Online) / Same seminar on the 15 October (Online)

PTS Introduction to compliance work and quality assurance for paper and board in contact with food.

<https://www.ptspaper.com/>

29-30 September (Online)

International Conference food contact compliance.

<https://www.packagingmeeting.it/en/shop/conferences/international-conference-food-contact-compliance-en/>

6-7 October (Radebeul Dresden)

PTS Biobased solutions in papermaking and converting.

<https://www.ptspaper.com/>



7 October (Grenoble)

Final workshop SHERPACK

http://www.sherpack.eu/docs/fckeditor/7/file/Prog_Sherpack_Final_Workshop.pdf

21-23 October 2020 (Online)

Food Packaging Forum's workshop 2020

Improving the chemical safety of food contact articles: Linking policy making with scientific research.

<https://www.foodpackagingforum.org/events/workshop2020>

18-19 November (Online)

9th International Akademie Fresenius Conference "Residues of food contact materials in food."

<https://www.akademie-fresenius.com/events/detail/produkt/9th-international-akademie-fresenius-conference-residues-of-food-contact-materials-in-food-onli/>

1-3 December (Online)

Smithers Conference "Plastic and paper in contact with foodstuffs"

<https://www.food-contact.com/plastics-paper/about>

24-26 February 2021 (Barcelona)

ILSI 7th International symposium on food packaging

<https://ilsi.eu/event/7th-international-symposium-on-food-packaging-scientific-developments-supporting-safety-and-innovation/>

6th August 2020

