



PFAS in Food Packaging Alternatives Assessment Update: 4-14-20

Ken Zarker, Ecology Project Manager & Catherine Rudisill, M.S., Work
Assignment Manager, SRC, Inc.

EZView Website:

https://www.ezview.wa.gov/site/alias_1962/37610/pfas_in_food_packaging_alternatives_assessment.aspx



COVID-19 Update

- PFAS AA team at Ecology and SRC are continuing to work from home.
- Some stakeholders have indicated their ability to engage at this time is limited.
- This webinar will likely be repeated to give all stakeholders an opportunity to engage on this topic.
- We appreciate all of our stakeholders who are supporting our communities during this crisis.



PFAS Food Packaging AA Agenda

- Intro/Welcome
- COVID-19 Update
- Background
- Status Update & Announcements
- Performance Assessment
- Discussion

- This webinar is being recorded

Hazardous Waste and Toxics Reduction Program

DEPARTMENT OF
ECOLOGY
State of Washington

Focus on: Alternatives to PFAS in Food Packaging



What are PFAS?
Per- and polyfluorinated substances (PFAS) are a class of synthetic chemicals used in hundreds of applications, including food packaging. PFAS easily contaminate groundwater because they are water-soluble, highly mobile, and difficult to filter out.

Who is exposed to PFAS?
Everyone.

In recent years, PFAS have been detected in Washington lakes, streams, fish, and drinking water wells.

Why does food packaging contain PFAS?
PFAS helps keep grease, oil, and water from penetrating food packaging, such as paper and paperboard. Common examples include:

- Fast food sandwich wrappers.
- Restaurant take-out boxes.

Washington State will ban PFAS in food packaging
In 2018, the Washington State legislature passed a new law that prohibits all per- and polyfluorinated substances (PFAS) in paper food packaging.

This PFAS ban is part of the [Toxics in Packaging Law \(RCW 70.95E\)](#).¹ In 1991, the Washington State legislature passed RCW 70.95G to limit the amount of four toxic metals (mercury, cadmium, lead, and hexavalent chromium) in packaging sold in the state.

In 2018, this law was amended to add PFAS.

When will PFAS be banned in food packaging?
Safer alternatives to PFAS in food packaging must be available before the ban takes effect. The law requires Ecology to study PFAS in food packaging and assess the safety of alternatives. The ban will take effect January 2022, after we:

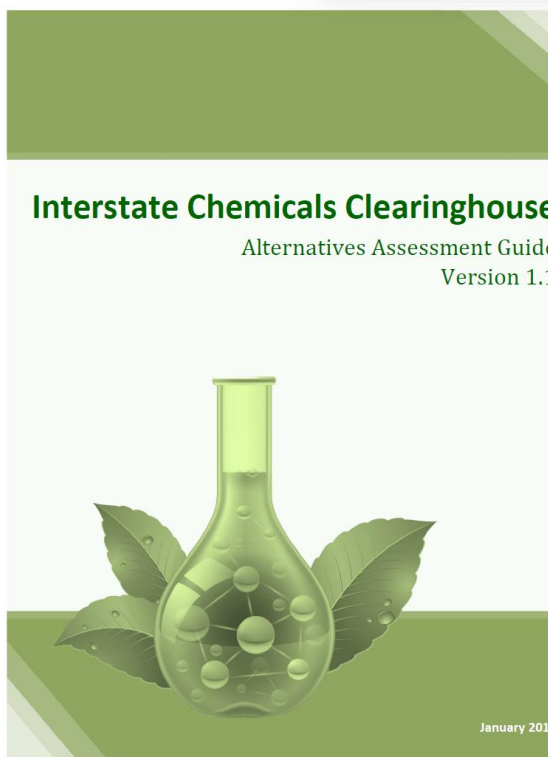
- Identify safer alternatives.
- Receive feedback from an external peer review.
- Publish the findings in the Washington State Register.

How do I comment on and stay updated?
Ecology and Department of Health are working together to develop a [PFAS Chemical Action Plan \(CAP\)](#).² The goal of a CAP is to identify the potential health and environmental effects of persistent, bioaccumulative, and toxic chemicals, and recommend actions to reduce or eliminate those impacts.

We have a PFAS CAP listserv where you can receive updates. To subscribe, visit the [CAP Advisory Committee website](#).³ We will host periodic conference calls to share updates on the PFAS AA. Those updates and any documents will be posted on the CAP website.

¹ <http://app.ling.wa.gov/RCW/default.aspx?Cite=70.95G>
² ecology.wa.gov/PFAS
³ <https://www.ezview.wa.gov/?alias=1962&pageid=37105>

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Interstate Chemicals Clearinghouse
Alternatives Assessment Guide
Version 1.1

January 2017



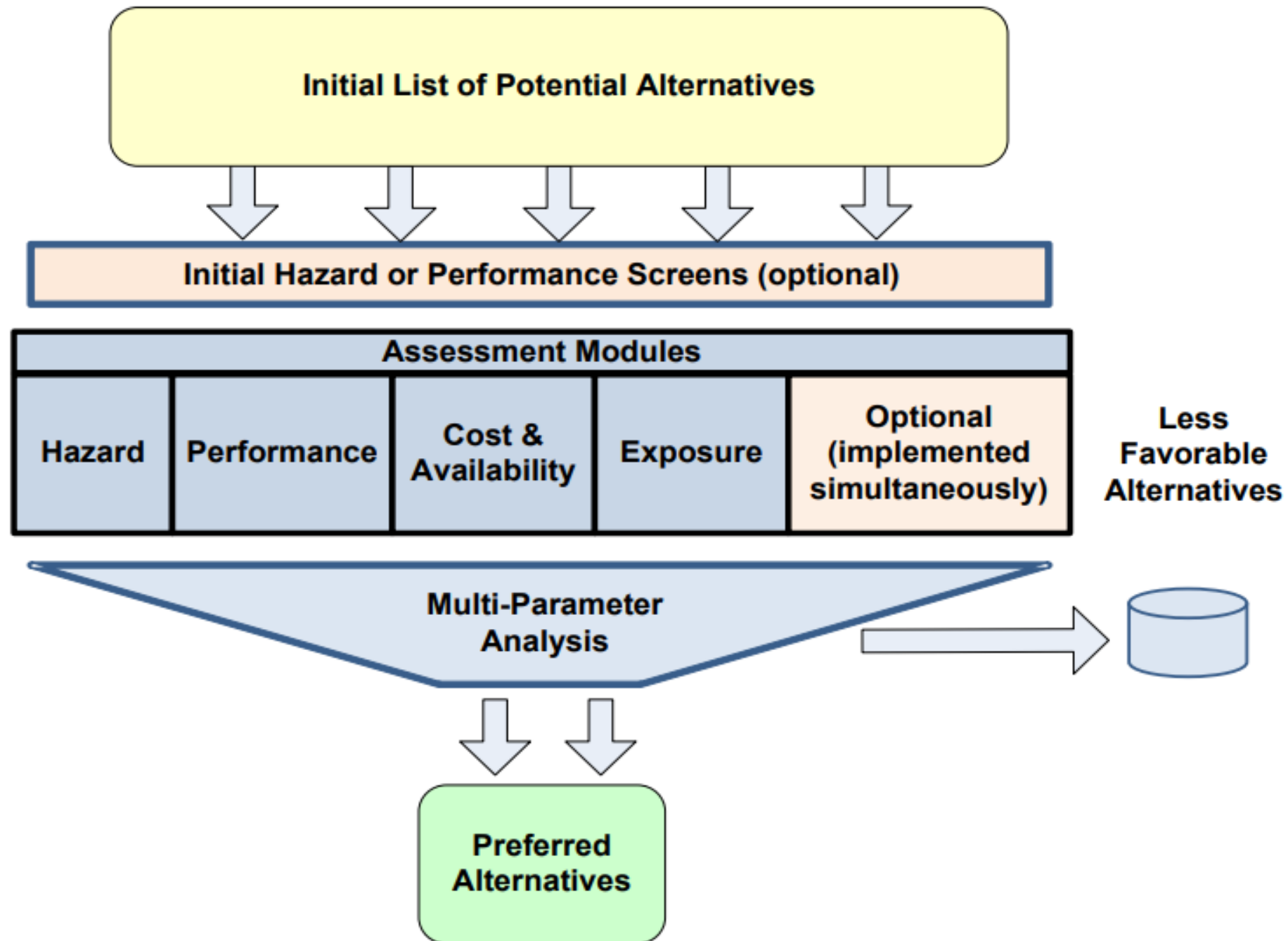
WA Toxics in Packaging Law

RCW 70.95G.070

- Legislature passed toxics law that bans perfluorinated and polyfluorinated substances in paper food packaging.
- Ecology will determine whether alternatives are available for specific packaging applications. A peer review process is required.
- Ecology reports to legislature and ban will take effect two years later.
- Based on the Interstate Chemicals Clearinghouse (IC2) modules: **Hazard (L2); Exposure (L1); Cost & Availability (L1) & Performance (L1).**



The Interstate Chemicals Clearinghouse (IC2) Alternatives Assessment Guide



Product Categories in Scope

- **Category 1: Paper Wraps, Liners, Bags & Sleeves**
- **Category 2: Dinnerware**
 - Plates, bowls, trays
- **Category 3: Food Service Containers**
 - “Take-out” cartons or containers for storage and transport



Proposed Alternative Chemicals for Hazard Evaluation

Low Concern	EPA Safer Chemical	Hazard Evaluation Candidates
Uncoated paper	Petroleum wax ¹	Silicone coatings
Aluminum foil	Bio-based wax ²	Polyvinyl alcohol coatings
	Kaolin clay (CAS 1332-58-7)	Polylactide (foam, plastic, coating) (CAS 9051-89-2)
		Polyethylene coatings
		Polyethylene terephthalate coatings
		Additives, residuals, contaminants, degradation products

1. Related [EPA SCIL](#) listings may include Paraffin waxes, petroleum, clay-treated (CAS 64742-43-4) and Paraffin waxes, petroleum, hydrotreated (CAS 64742-51-4)
2. Related EPA SCIL listings may include Soybean oil and soybean oil derivatives that could be hydrogenated to produce waxy substances: soybean oil (CAS 8001-22-7), soybean oil fatty acids (CAS 68308-53-2), soybean oil, methyl esters (CAS 67784-80-9), and soybean oil, sulfated, sodium salt (CAS 61790-16-7)



Confidential Business Information (CBI) Guidance Update

- Updated Guidance – new guidance based on discussions with several companies willing to disclose additional information via Confidential Business Information process.
 - CBI Process and Request Template PDF – guidance and template for submitting a CBI request to Ecology.
 - Third Parties – guidance for Ecology sharing of CBI with contractors and peer reviewers (if required).
 - Ecology consultations & technical assistance available.



E-Comment Tool

- E- Comment feature available:
https://www.ezview.wa.gov/site/alias__1962/37610/DesktopDefault.aspx?alias=1962&PageID=37610

Share feedback with us

We welcome your input and feedback. If you have information or data to share that could help inform our alternatives assessment process, please [submit your comments](#) to us.



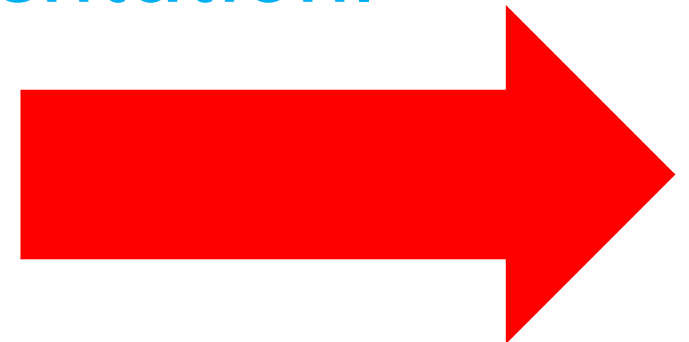
Technical Documents

- New documents have been posted to the website and are available for stakeholder comment:
 - [Product and Alternatives Scoping Paper \(2/24/2020\)](#)
 - [Hazard Methodology \(3/19/2020\)](#)
 - [Exposure Methodology \(3/19/2020\)](#)
 - [CBI Guidance & Template \(4/10/2020\)](#)



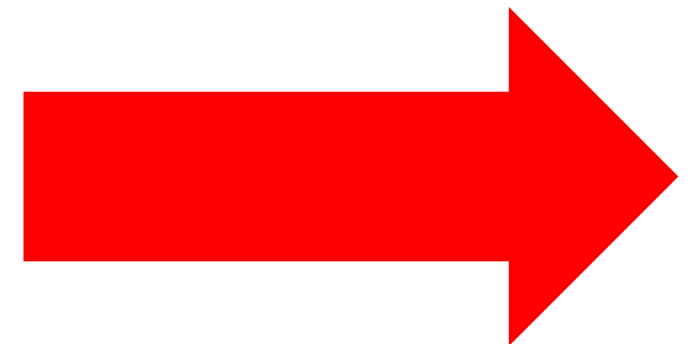
Performance Assessment

- Will be implementing webinar polls to get direct feedback from stakeholders during this call.
- Poll questions will appear on the righthand bar near the chat feature.
- Answers for these polls are anonymous.
- For information gathering purposes to help develop our assessment approach.
- Discussion will continue after the presentation.



Stakeholder Question #1

How would you categorize your organization?



IC2 Guidelines Overview: Level 1 Performance

Series of questions based on qualitative data and promotional materials:

What are the performance needs at the chemical, material, product, and process level?

Has the alternative already been identified as favorable with respect to performance?

Has an authoritative body demonstrated that the alternative functions adequately for both the process and product?

Is the alternative considered favorable but there are indications that it does not perform as well as the current chemical?

Has the proposed alternative been identified by expert sources as unfavorable?



What are the performance requirements for the product?

- One of the key questions for this assessment.
- Aim to keep requirements as broad, yet inclusive as possible.
 - Identify the “essential requirements”
- The more requirements we include in the assessment, the more complex and time consuming.
- Need to include that if alternatives are being used, this implies the users’ requirements are being met.



CASE STUDY: Performance may be unique, complex, and unexpected



SPECIALTY PACKAGING INC.

FEATURED CASE STUDY

A Flour Based Tortilla Package

A customer had a problem ... each time they cooked a burrito on a clamshell style grill ... cheese would leak onto the grill ... require time consuming cleaning at the worst time ... when they are busy

THE CUSTOMER WANTED US TO DEVELOP A PACKAGE TO MEET THE FOLLOWING REQUIREMENTS:

- One package – to cook the burrito in, and to service the customer
- Package must keep the grill clean
- The tortilla can't stick to the package
- The package cannot char, singe or burn
- Package must be low cost
- Package must be printed



Stakeholder Question #2

What are your personal **top 3** performance requirements for wraps, liners, bags, dinnerware, and take-out containers?



Is it considered favorable but there are indications that it does not perform as well as the current chemical?

- Some promotional materials and comments from stakeholders have indicated that not all needs may be met, especially for molded fiber alternatives.
- Some stakeholders have shared with us that PFAS products may be over-engineered for certain uses.
- Manufacturers must demonstrate that they're meeting the essential requirements of their customers needs.



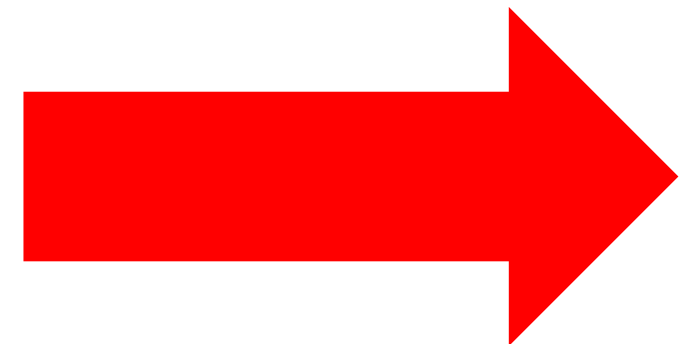
Role of Authoritative Bodies and Expert Sources

- Question 3: Authoritative bodies?
- Question 5: Expert sources?
 - End users: critical to determining if these products perform
 - Mills, tollers, converters, product manufacturers
 - Technical experts in academia and research & development



Stakeholder Poll #3

Have you tested or successfully substituted an alternative for the products categories under this assessment?



Next Steps

- Continue stakeholder discussions concerning sharing of CBI and performance information.
- Develop performance assessment decision rules.
- Begin conducting hazard assessments.
- Monitor the COVID-19 impacts and adjust strategies as needed.
- Next Call: May 26th 11am PT/2 pm ET
 - Likely to be a repeat of this presentation





Contacts:

Ken Zarker, Ecology, ken.zarker@ecy.wa.gov

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