

The webinar will begin shortly.

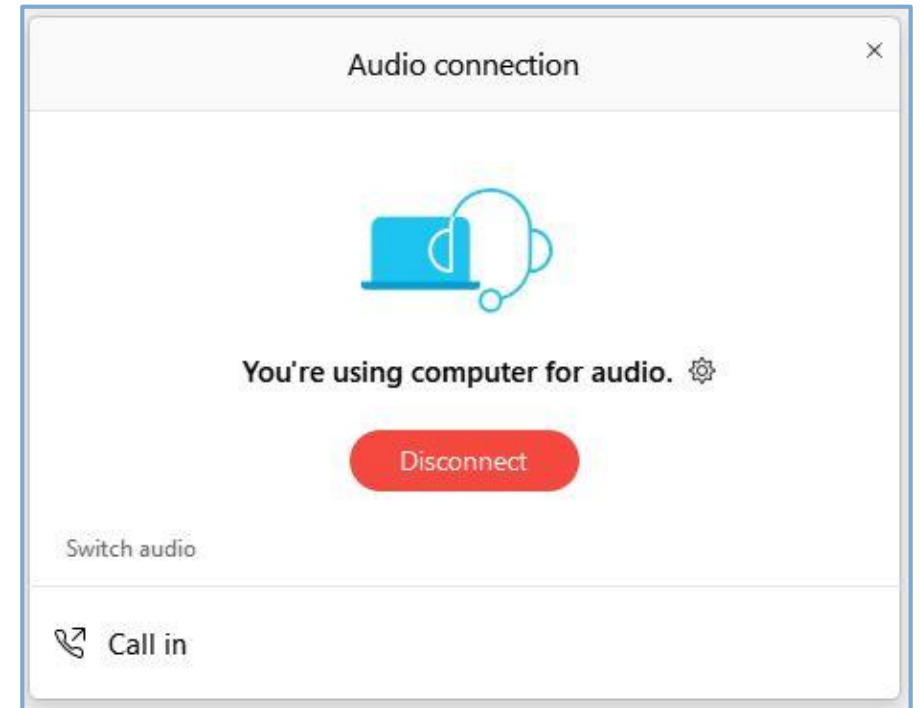


# Per- and Polyfluoroalkyl Substances in Food Packaging Alternatives Assessment

April 14, 2021

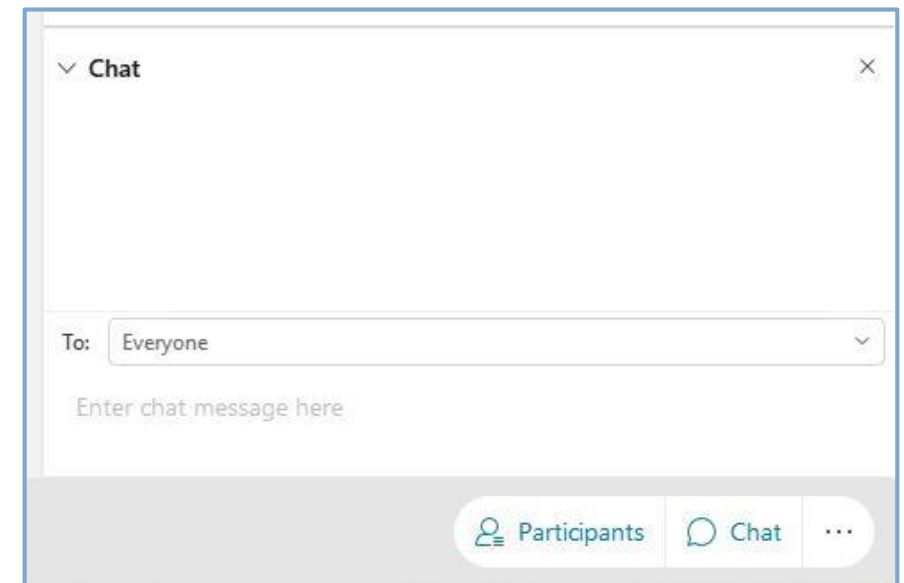
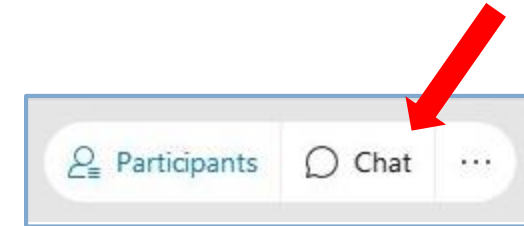
# Audio connection logistics

- For audio connection, we recommend using your computer speaker.
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# Webinar logistics

- Raise your hand to provide verbal comments.
  - Dialing in via phone? Press \*3 to raise your hand.
- Or, type questions and comments into the Q & A box.
- Send all technical difficulty issues to the host via the chat box.
  - To open the chat box, select the chat button at the lower right hand side of your screen.
- In the event of major technical difficulties, we will reschedule the webinar.





# Per- and Polyfluoroalkyl Substances in Food Packaging Alternatives Assessment

April 14, 2021

# Topics for today

1. Review of statutory considerations
2. Review of methods from first assessment
3. Stakeholder feedback and discussion

# Statutory considerations

- Determinations must be made using Alternatives Assessment
  - Must evaluate less toxic chemicals and nonchemical alternatives
  - Must follow IC2 guidelines
  - Must use IC2 modules to evaluate potential alternatives for:
    - Chemical hazards
    - Exposure
    - Performance
    - Cost
    - Availability
- Determination of safer alternatives must be supported by external peer review

# Definitions

- Statutory Definitions:
  - Perfluoroalkyl and polyfluoroalkyl substances ("PFAS chemicals")  
“A class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.”
  - Food package  
“A package or packaging component that is intended for direct food contact and is comprised, in substantial part, of paper, paperboard, or other materials originally derived from plant fibers”
- Primary PFAS function: provide oil, grease, and water resistance to fiber-based food packaging .

# Methods to evaluate alternatives

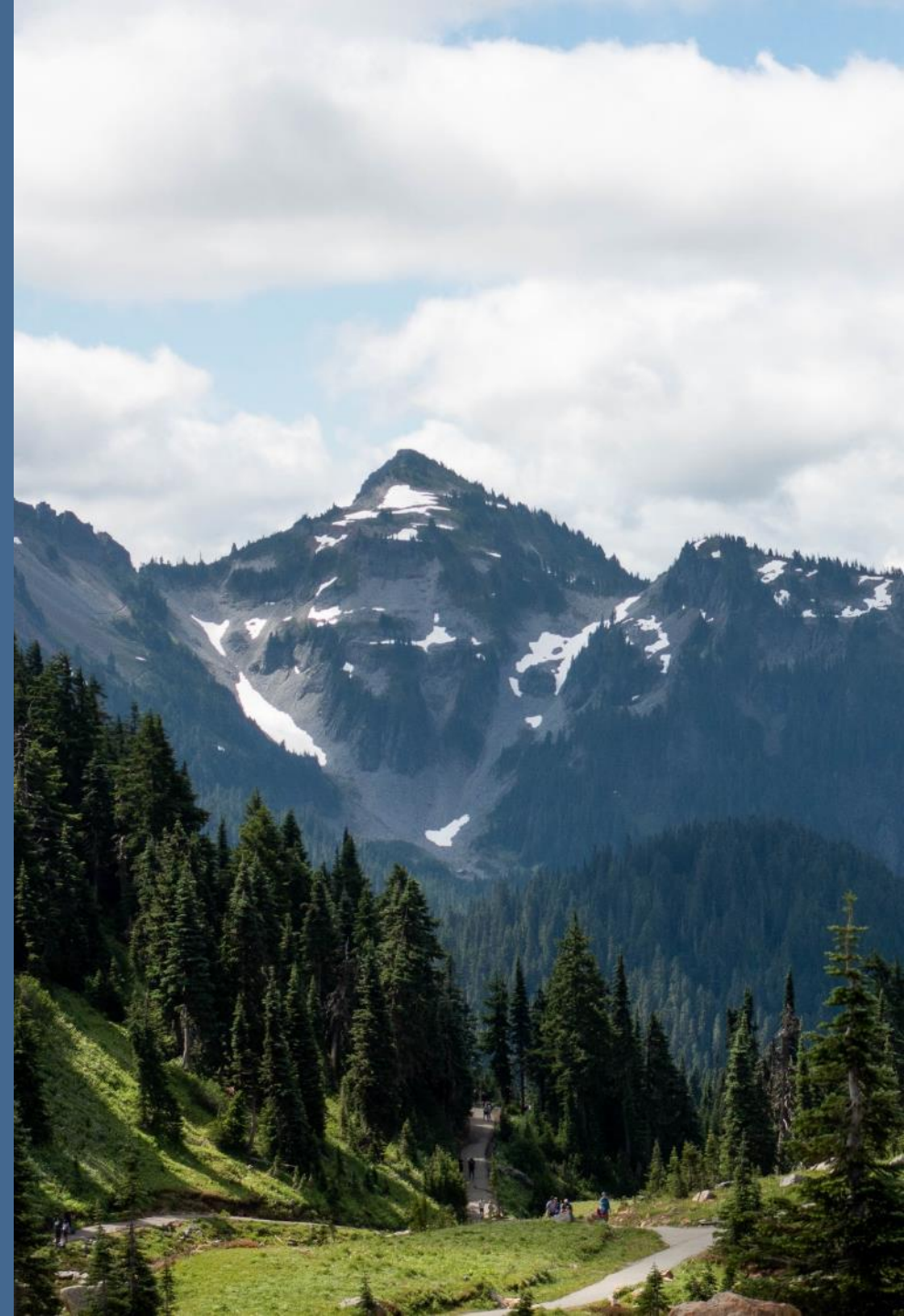
Assessment Module	IC2 Guide Level Used	Products or substances evaluated?	Information Collected
Hazard Assessment	Level 2	Substance	Previous hazard assessments, toxicological data, authoritative chemical lists
Exposure Evaluation	Level 1	Substance	Exposure data, physical characteristics of substance
Performance	Level 1*	Product	Promotional/Technical information, opinions of consumers
Cost and Availability	Level 1*	Product	Price information, product manufacturer information, case studies

\* Modified to include additional statutory language: “the safer alternatives must be readily available in sufficient quantity and at a comparable cost, and perform as well as or better than PFAS chemicals”





# Stakeholder feedback and discussion



# Discussion logistics

- Questions, comments, concerns—all feedback welcome.
- Raise your hand to provide verbal comments.
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- Or type questions and comments into the Q & A box.

∨ Q & A ×

All (0)

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Select a question and then type your answer here. There's a 512-character limit.

Send Send Privately

## Hazard

- No specific feedback received

## Exposure

- No specific feedback received

## Performance

- If performance requirements need to be considered for manufacturing aids (such as mold release agents), one could assume any products sold at a reasonable price were made with manufacturing aids that perform as well as PFAS.

## Cost and availability

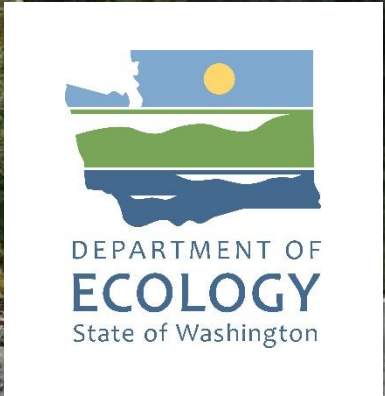
- Cost: Could think about percentage cost increases to overall purchase price (as opposed to the price increase of the packaging)
- Cost: Consider willingness of producer to pass cost increase from packaging to product purchaser
- Markets develop quickly; even if an alternative is only available to large businesses now it may become available to small businesses later

## PFAS

- Talk to FDA about new submittals for PFAS (e.g. as FCNs)
- OECD defines PFAS as a class chemically, but meaningfully regulating the class is difficult (how do we consider what is hazardous)

## Other feedback

- The PFAS AA timeline is too long to accurately capture evolving market
- Other areas have considered categorical exemptions for certain hard to find products- could we consider something similar
- When a required product is in low supply, local operators can get one-year waivers on product purchasing requirements (e.g. compostable product requirements in some Washington localities)



# Questions?

# Contact us!

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