

The webinar will begin shortly.



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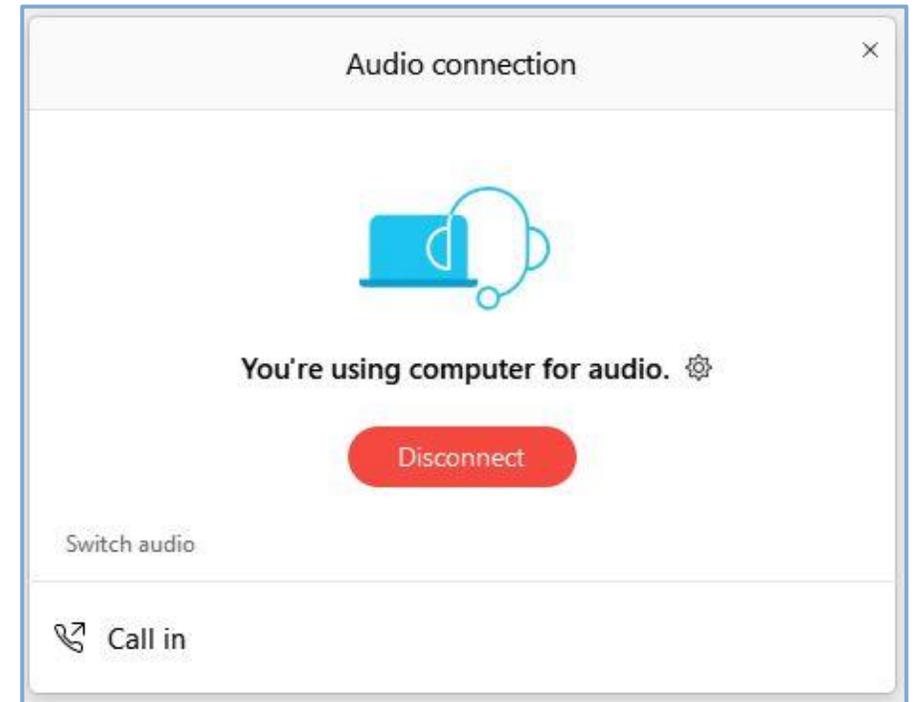
Scope Overview

Per- and Polyfluoroalkyl Substances in Food Packaging Second Alternatives Assessment

May 25, 2021

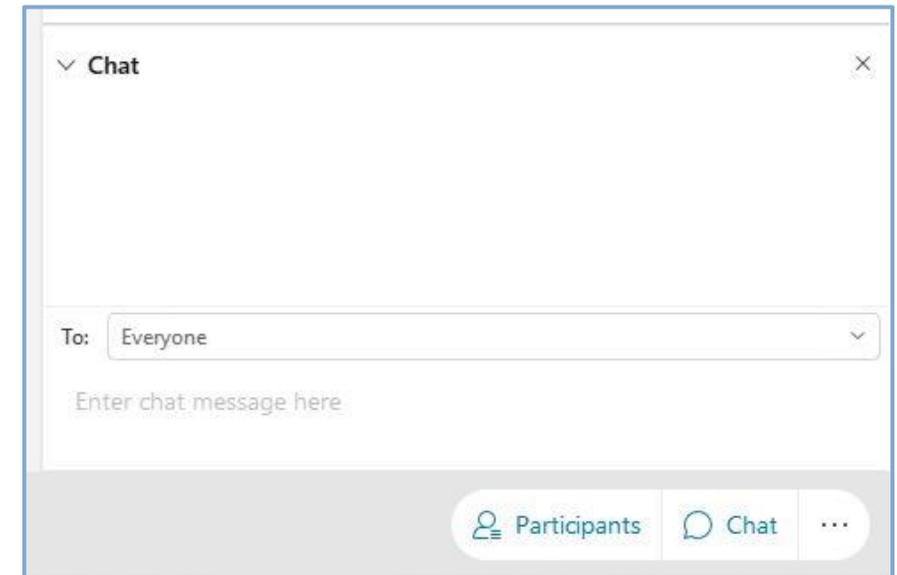
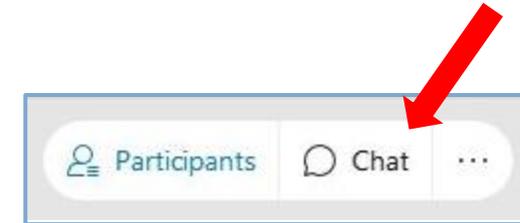
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Webinar logistics

- Raise your hand to provide verbal comments.
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Scope Overview

Per- and Polyfluoroalkyl Substances in Food Packaging Second Alternatives Assessment

May 25, 2021

Topics for today

1. Purpose of draft scope document
2. Information in the draft scope
 - Defining food packaging applications
 - Identifying candidate alternatives to PFAS in food packaging
 - Requesting new information
3. Ways to give feedback
4. Q&A

Background: ESHB 2658 (2018)

- Prohibits sale or distribution in Washington State of food packaging to which PFAS have been intentionally added in any amount
 - Prohibitions are by “specific food packaging application,” not all packaging generally
 - Prohibition is for PFAS as a class (defined as “a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom”)

Background: ESHB 2658 (2018)

- BEFORE restriction can take effect, Ecology must identify safer alternatives are available through an alternatives assessment (AA):
 - Must evaluate less toxic chemicals and nonchemical alternatives.
 - Must follow IC2 guidelines to evaluate potential alternatives.
- Submitted first set of findings to the Legislature in February 2021
 - Identified safer alternatives for:
 - Wraps and liners.
 - Plates.
 - Food boats.
 - Pizza boxes.
- We're working on a second AA now.

What is the purpose of this document?

- “Scope-of-work” for the second AA
- It contains:
 - Definitions for food packaging applications:
 - Determines what types of food packaging we will look at in this AA
 - Determines what types of food packaging products might be subject to a ban
 - A list of candidate alternatives we plan to evaluate
 - Includes criteria for why we choose to evaluate certain alternatives
 - A list of what information we are currently looking for in this AA

Background—defining “specific food packaging applications”

- Definition of food package (from RCW 70A.222.010(1)):
 - Intended for direct food contact.
 - Comprised, in substantial part, of paper, paperboard, or other materials originally derived from plant fibers.
- PFAS added to food packaging provide oil, grease, and water resistance.



First AA—defining “specific food packaging applications”

- Defined applications based on specific examples of food packaging products.
- Focused on packaging used to hold, store, and transport freshly prepared food (e.g. a sandwich).



First AA: defining “specific food packaging applications”

- **Food contact paper** (two applications):
 - Wraps and liners.
 - Bags and sleeves.
- **Dinnerware** (four applications):
 - Plates.
 - Bowls.
 - Trays.
 - Food boats.
- **Take-out containers** (four applications):
 - Pizza boxes.
 - French fry cartons.
 - Clamshells.
 - Interlocking folded containers (also called food containers or pails).
- In the first AA, we found safer alternatives for:
 - Wraps and liners.
 - Plates.
 - Food boats.
 - Pizza boxes.

First AA: defining “specific food packaging applications”

- In the first AA, defined applications based on specific examples of food packaging products.
- Drawbacks:
 - Names used in packaging didn’t always align with our definitions.
 - Consumers use many products interchangeably.



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Second AA: defining “specific food packaging applications”

- Still focused on holding, storing, and transporting freshly prepared food (e.g. a sandwich).
- Not including applications where we identified safer alternatives in first AA (such as wraps & liners or pizza boxes).
- Using the function of the packaging to define food packaging applications.



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Defining “specific food packaging applications”

- **Closed containers:** Containers that enclose food on all sides. Interlocking pieces or overlapping walls hold the container closed for transport.
- **Examples:**
 - Clamshells
 - Bakery boxes
 - Deli containers



Defining “specific food packaging applications”

- **Flat serveware:** Shallow, flat-bottomed containers with large surface areas used for serving food. May have one large surface or multiple compartments to separate food items.
- **Examples:**
 - Plates
 - Cafeteria-style trays



Defining “specific food packaging applications”

- **Open-top containers:** Containers that enclose food on all but one side. They are designed to hold solid foods for serving or transportation.
- **Examples:**
 - French fry cartons
 - Food boats
 - Paper cones
- Bowl, bags and sleeves can be used as open-top containers, but not all open-top containers can be used as bowls, bags, or sleeves.



Defining “specific food packaging applications”

- **Bags & Sleeves:** Flat-bottom bags used to transport food or sealed-end bags that can hold food for either service or transport. Made from flexible material.
- **Bowls:** Open-topped containers with wide openings and bottoms that allow spooning of food.
 - Also includes portion cups.



Candidate alternatives to PFAS in food packaging

- For each of the five food packaging applications, we need to identify candidate alternatives to evaluate in the AA.
- Alternatives will be one of three types.
- Principles used to identify candidate alternatives:
 - Food and Drug Administration (FDA) approved.
 - Known/likely safer.
 - Availability in food packaging market.
 - Has publicly available information.
 - Meets environmental performance standards.

Candidate alternatives for second AA

- **Alternative chemical treatments:** applied to paper instead of PFAS
 - Bio-based coatings
 - Bio-based waxes
 - Polylactic acid (PLA)
 - Plastic coatings
 - Acrylics
 - Polyvinyl alcohol (PVOH) and ethylene vinyl alcohol (EVOH) copolymer
 - Polyethylene (PE) and polyethylene terephthalate (PET)
 - Paraffin wax
 - Clay
 - Siloxanes
 - Proprietary treatments

Candidate alternatives to PFAS in food packaging

- **Alternative chemical treatments:** applied to paper instead of PFAS
 - Includes alternatives that are:
 - Applied as coatings to surface of paper or paperboard.
 - Added to plant fiber slurry before paper or paperboard is formed.
 - May need to consider alternative mold release agents (or de-molding agents) for molded fiber products.
 - Potential source of PFAS in molded fiber products.
 - Extent of use not well known.

Candidate alternatives to PFAS in food packaging

- **Alternative base materials:** materials used in place of PFAS-treated paper, either:
 - Plant fiber based (e.g. bamboo, sugarcane, vegetable parchment)
 - Non-fiber based:
 - Biologically derived/compostable plastics (PLA and polyhydroxyalkanoate or PHA)
 - Aluminum
- **System alternatives:** used instead of disposable packaging
 - Reusable food contact products.

Alternatives to PFAS not considered

- **Single-use, petroleum-based plastic** materials used in place of PFAS-treated paper.
 - Includes polypropylene, PET, high density PE
- **Polystyrene** materials used in place of PFAS-treated paper.
- Emerging alternative substances.

Information we are looking for

- Reminder: Our alternatives assessment must use IC2 AA guide modules to evaluate potential alternatives:
 - Chemical hazard
 - Exposure
 - Performance
 - Cost and availability
- We're interested in information about:
 - An alternative substance (see candidate alternative list).
 - A product that uses **a known, specific alternative substance.**

Information we are looking for

- Information to help evaluate chemical hazard or exposure potential:
 - Chemical or product identity.
 - Chemical or product hazard assessments (must use relevant hazard assessment).
 - Physiochemical properties or exposure data.
- Information about the performance of a product made using a known alternative:
 - Promotional materials or product performance data sheets.
 - Information from product consumers about performance.
 - Case studies of product use by companies.

Information we are looking for

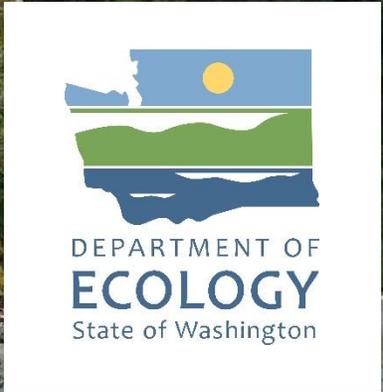
- Information about the cost and availability of a product made using a known alternative:
 - Product cost information, such as price differences.
 - Availability of reusable food container programs.
 - Availability of specific alternative chemical treatments or base materials.
 - General cost or availability information about food packaging, such as:
 - Market or price information.
 - Lifecycle costs associated with the use of different types of food packaging.
 - Case studies of PFAS-free food packaging use.

We want to hear your feedback!

- We welcome your feedback during our Q&A session coming up
- We also welcome your feedback in the coming weeks
- A draft of this scope document is on our website:
 - Please submit a comment with your feedback.
 - If you have relevant information for the assessment, reach out!
- Reach out if you'd like to set-up a follow-up meeting.

Expected Timeline

Action	Expected timeframe
Input on draft scope	Now – End June 2021
Revising scope (if needed)	July 2021
Release draft assessment of PFAS as a class for input	Summer 2021
Release draft assessment methods	Fall 2021
Collect new information	Now – End 2021



Questions?

Contact us

Webpage: bit.ly/pfas-food-aa

Rae Eaton: rae.eaton@ecy.wa.gov

Feedback during Q&A

Definitions

- Applications should be defined more broadly (on level of packaging category)

Candidate alternatives

Information asks

- goodstartpackaging.com has a lot of alternatives various types with pricing

Other feedback

- Many states are moving to ban PFAS in products, speed is essential
- Ecology has identified safer materials, can that be enough to find safer alternatives
- Ecology should work to more quickly incorporate new information about products- market moves quickly
- Other stakeholders interested in a slower timeline- concerned about pressure caused by recent expanded polystyrene ban