

## Position Statement on PFAS chemicals in packaging

July 2023

### **Boomerang Alliance agrees that PFAS in packaging is a concern. We advocate for a mandatory national phase-out of PFAS chemicals in all packaging**

Boomerang Alliance acknowledges the emerging information regarding the presence of PFAS (Perfluoroalkyl and Polyfluoroalkyl Substances) in compostable and non-compostable takeaway foodware items.

PFAS chemicals (or “forever chemicals” as they are often referred to due to their extreme persistence in the environment) are a group of complex, manufactured chemicals that have historically been used in a variety of applications and industries. These chemicals are an additive to items such as non-stick cookware, clothing and carpets to aid in stain resistance, and in food packaging (both plastic and non-plastic) to limit oil and liquid dispersion. Some PFAS chemicals have been found to migrate from food packaging into food and are associated with adverse health effects<sup>1</sup>.

While no one test can screen for all PFAS and its derivatives, elevated levels of fluorine are a reliable indicator of the presence of PFAS in food packaging. Studies conducted overseas suggest that the highest fluorine concentrations were found in moulded fibre products<sup>1</sup>, for e.g., ‘bagasse’ - a moulded fibrous material made from sugarcane, commonly used as a food packaging material. This has brought into question the safety of the use of moulded fibre products and their suitability as an alternative to single-use plastics.

An investigation by the Australian Packaging Covenant Organisation (APCO)<sup>2</sup> identified elevated levels (above 100ppm) of PFAS chemicals in some fibre-based packaging but did not identify what that packaging was or the standards they were produced under.

PFAS is not an inherent characteristic of moulded fibre products, rather it is added to increase oil resistant properties. There should not be a blanket assumption that all moulded fibre products contain high levels of PFAS. The Australian Compost Standards AS 4736 (industrial) and AS 5810 (home) set a limit for fluorine of 100 ppm or less, which means if an item meets the standard, it has no detectable or very low total fluorine.

**Boomerang Alliance allows for the use of Australian Certified Compostable moulded fibre products within its Plastic Free Places program. Our priority is always to promote avoidance and reuse as preferred options, whilst recognising that disposable non-plastic or compostable products as transitional items and better than fossil-fuel derived standard plastics.**

Moulded fibre products certified under Australian Compost Standards do provide a suitable disposable alternative to the use of plastics - particularly for hot, liquid-based foods. They can greatly lessen reliance upon single-use plastics in the absence of the preferred option - reusables.

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<sup>1</sup> <https://www.env-health.org/wp-content/uploads/2021/05/Executive-Summary-FINAL-by-itself-1.pdf>

<sup>2</sup> <https://documents.packagingcovenant.org.au/public-documents/PFAS+in+Fibre-Based+Packaging>

They can also be a viable alternative to single-use bioplastics. Moulded fibre products require less specific conditions to biodegrade than do bioplastics. This is preferable in a circular economy, especially where industrial compost facilities needed to effectively compost bioplastics are not readily available.

Bagasse is also a by-product of the sugarcane industry and has a lower carbon footprint and resource dependency than materials grown specifically for purpose, such as corn for bioplastic.

It is important to place fears over moulded fibre products into perspective. Despite the known detriment of petroleum-based products to human and environmental health, fear or trepidation associated with the use of bagasse and other moulded fibre alternatives use may unnecessarily force the narrative back towards single-use plastics.

**Boomerang Alliance agrees that PFAS in packaging is a concern. We advocate for a mandatory national phase-out of all PFAS chemicals in all packaging.**

In September 2022, the Australian Packaging Covenant Organisation (APCO) released an Action Plan to address PFAS Chemicals in packaging. The Action Plan is 'designed to support businesses to voluntarily phase-out intentionally added PFAS in fibre-based food packaging by 31 December 2023'. The Action Plan is endorsed by State and Territory governments.

We note that compostable packaging certified to the Australian Standards does not allow the intentional addition of PFAS chemicals, nor do foreign certified fibre-based packaging.

We do not support a voluntary phase-out but a mandatory phase-out of PFAS chemicals in ALL packaging by 31 December 2023.

We may review our position as more information becomes available.