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PFAS Content in Products: Certification and Acceptability

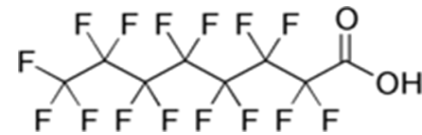
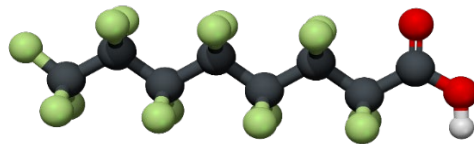
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Understanding, Managing and Mitigating PFAS Content in Products: Terms currently used for PFAS Certification or Acceptability



PFAS Bans in the News

- **Mandatory Bans**

- State initiatives and some federal
- **Food packaging, Carpeting/upholstery, Fabrics, Cosmetics, Juvenile products**

- **Voluntary Phase-outs**

- 6:2 FTOH from food packaging (**3 manufacturers**)
- PFAS in carpets and rugs (**Home Depot**)
- PFAS in some product categories but not all (**REI**)
- PFAS in brand-owned products and textiles (**Target**)
- Other announcements from **Staples, Office Depot, Lowe's, IKEA and others**



What does “No PFAS” really mean?

Key Concepts To Remember

Product Concepts

**What
compounds
are covered?**

- All/some PFAS, Fluorine

**Why is it
there?**

- Intentionally-added vs Unintentional Impurities

Where is it?

- Direct contact vs other portions of products

Certification Concepts

- Public or Private entity
- "Honor System" or Verified
- Static or Updated
- Analyte suite



Common Product Labels for PFAS

- **Labels**

- PFOS-free, PFOA-free
- PFAS-free
- No Added PFAS
- Fluorine-free



Project Example

Supply-Chain Vulnerability and Alternatives Assessment

- Review of SDS
- E-mail outreach to vendors and manufacturers
- Telephone calls
- Independent desktop research
- Lab analyses



Institutional Certifications – Intentionally Added

Types of Certifications

Institution	Products	Criteria
USEPA – Safer Choice	Industrial and consumer products	PFAS not listed but may fail persistence criteria; Exceptions allowed;
FDA	Food-contact equipment & packaging	Authorized limited PFAS use;
Green Screen	PFAS-free AFFF	Less than 1 ppm Total Organic Fluorine
BPI	Compostable products and packaging	No intentionally added PFAS; Limit of 100 ppm total fluorine; SDS review; BPI-approved lab testing
EWG	EWG-Verified Program for consumer products	On “Unacceptable” list of ingredients; Right to perform random testing
PFAS-Central	Referrals to PFAS-free products	Based on declared company policy , no independent verification

Other Ecolabels and Recommendations

Furnishings and Buildings Materials

- Cradle-to-Cradle Certified Product Standard (<1,000 ppm Bronze, <100 ppm Gold)
 - Living Product Challenge 2.0, Declare 2.0 (**Must not contain PFAS**)
 - BIFMA e3 2019 – Furniture Sustainability Standard (**No PFAS >100 ppm**)
 - TUV Rheinland Green Products Mark (**PFOS <0.01% or 1 ug/m²**)
 - NSF ANSI/336 2018 – Commercial Furnishings Fabric (**No PFOS**)
 - UL 2777 – Hard Floor Care Products (**No PFOS, <100 ppm F-surfactants**)
 - SMART – Sustainable Materials Ratings Technology (**PFOS <Stockholm POPs**)
-
- **PFAS Drinking water standards on the order of parts per trillion...**

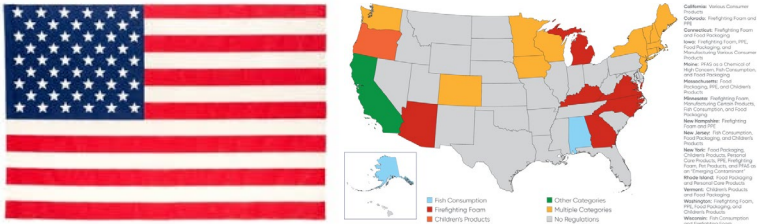


- <https://www.epa.gov/greenerproducts/how-epas-recommended-standards-and-ecolabels-address-and-polyfluoroalkyl-substances>

Institutional Requirements – Unintentional Impurities

Types of Certifications

Institution	Products	Criteria
USEPA – Safer Choice	Industrial and consumer products	Known residuals (unintended trace chemicals) must be reported if present at greater than 0.01 percent by weight or 100 ppm in the <u>formulation</u> ; PFAS likely meet the toxicity criteria to be designated as residuals of concern .
ECHA (EU)	Products placed on the market	PFOA cannot exceed 25 ppb ; PFOS cannot exceed 10 ppm



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PFOA-free, PFOS-free, PFAS-free



Implies effort to **control intentionally added PFAS**.



PFOA and PFOS-free only means that these compounds were not added but **other PFAS may be present**.



Manufacturer claims that products do not contain any intentionally added PFAS compounds but **how many and which PFAS are covered is not specified**.



Basis of the PFAS-free claim is typically not specified even after contacting the manufacturer directly; Unclear if manufacturer did internal or third-party analytical testing or has analytical information to support the claim



Fluorine-free

Control of **intentionally added PFAS**

Includes fire-fighting foams, water-repellent finishes for textiles

Manufacturer claims that products do not contain any fluorine-containing compounds in ingredients.

But **no additional information provided**.
Manufacturers typically could not confirm that analytical testing was conducted for fluorine or any other testing details



PFAS Not Detected



Control of **intentionally-added PFAS**.



Manufacturer claims they have tested the product and stated that PFAS compounds are **below the laboratory detection limits**.



However, **analytical information is lacking**, the suite of PFAS compounds that were tested for and the analytical methods and detection limits used are not specified and could exceed regulatory thresholds.



Understanding Labels and Certifications

- **If you're a vendor**

- What are you promising?
- What do your customers think they are buying?
- What is your liability?

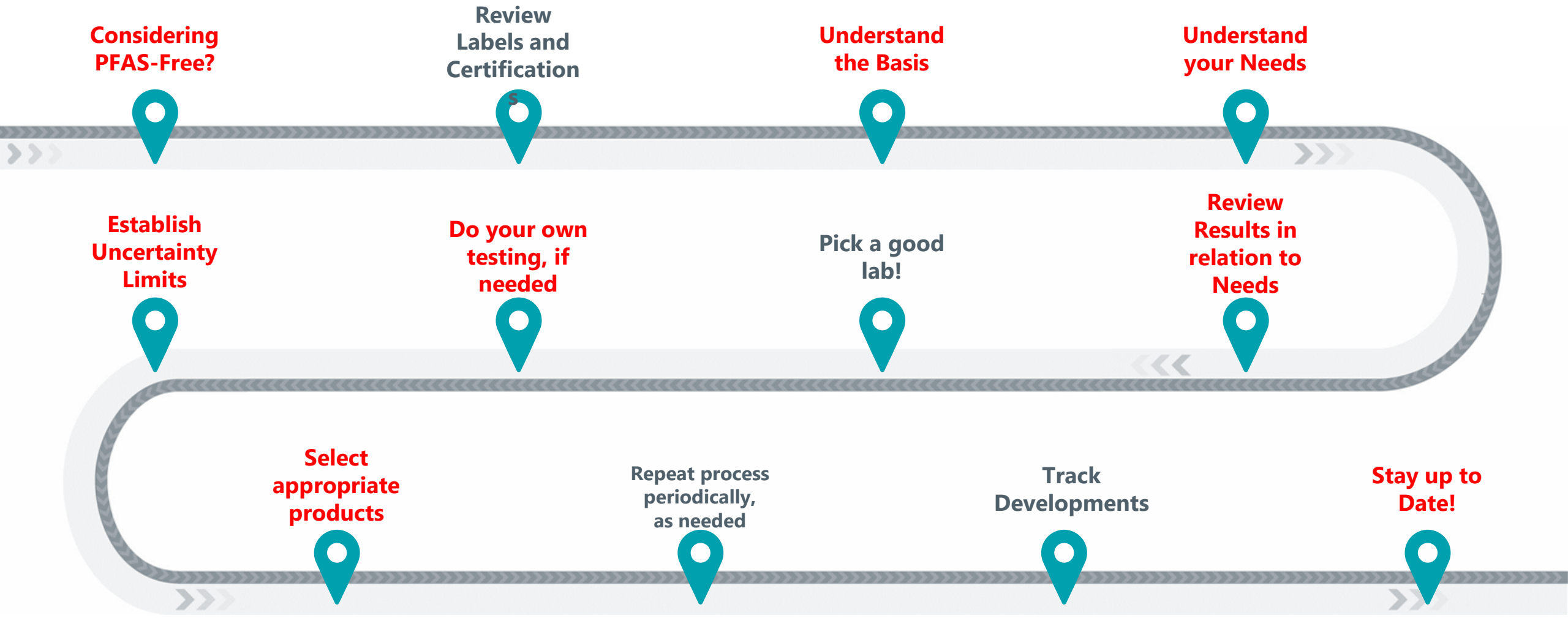


- **If you're a buyer/consumer**

- Why are you buying PFAS-free?
- Product safety or environmental concern?
- How much uncertainty can you tolerate?
- Should you do your own testing?

BANTOXIC
PFAS

Recommendations and Road Map



Summary

- **Understand the basis** of labels and certifications
- **Understand your needs**
- **Do your own testing, if needed**



An aerial photograph showing a winding river with a rocky shoreline, surrounded by dense green forest. The river flows from the top left towards the bottom right, with a prominent rocky bank on the right side. The surrounding forest is lush and green, with some cleared areas visible near the top left.

It's a PFAS world...

wood.