A close-up photograph of several brown cardboard food containers on a light-colored surface. One container in the foreground is open, showing a red sauce with chopsticks. Another container to the right is open, showing a salad with green vegetables and orange carrots. A third container in the background has a red flame-like graphic on its side.

Quick Guide to APCO's Action Plan to Phase Out PFAS in Fibre- Based Food Contact Packaging



AUSTRALIAN PACKAGING
COVENANT ORGANISATION

VERSION 3: SEPTEMBER 2023

INTRODUCTION TO THE QUICK GUIDE

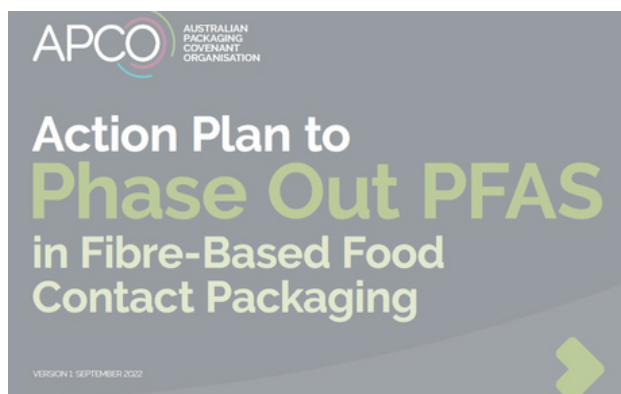
This Quick Guide has been developed to provide an overview of the APCO Action Plan to Phase Out PFAS in Fibre-Based Food Contact Packaging.

The action plan is designed to support businesses to voluntarily phase out intentionally added PFAS in fibre-based food contact packaging by 31 December 2023, with provision for a stock run-out period within a reasonable timeframe (approximately 6 to 8 months).

The Quick Guide will provide an overview of the key points in the action plan, and a guide to the actions businesses can take to support the phase out.



To read the Action Plan to Phase Out PFAS in Fibre-Based Packaging, click the thumbnail below.



Overview of the PFAS phase out in fibre-based food contact packaging

WHAT ARE PFAS?

Per- and polyfluoroalkyl substances (PFAS) are a group of several thousand fluorinated compounds, characterised by strong chemical bonds that make PFAS chemicals useful for a range of applications, including within some food contact packaging. PFAS are, however, very resistant to degradation in the environment, which makes them potential environmental pollutants.

If composted, most of these chemicals will not break down, and those that do will form other PFAS.

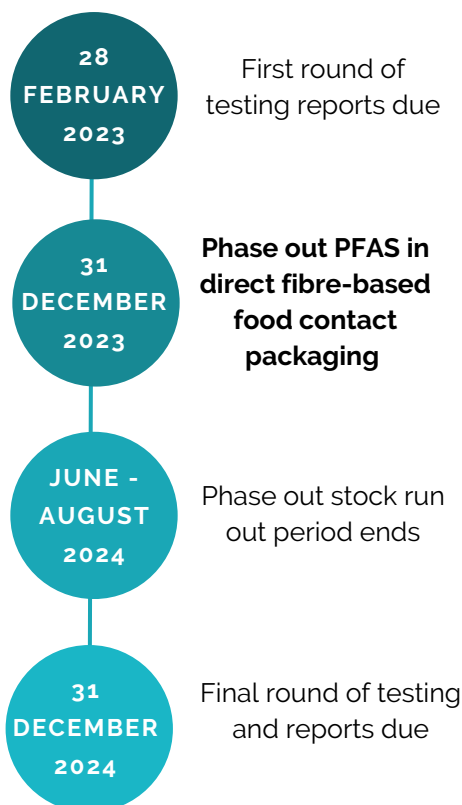
If recycled, these chemicals may transfer to recycled products – though this has not yet been confirmed in Australia.

WHY A PHASE OUT?

The action plan supports the implementation of the National PFAS Position Statement agreed to by all Australian governments in 2018, and the 2025 National Packaging Targets.

The action plan will help to ensure that the presence of PFAS does not become a barrier to realising the potential of compostable food contact packaging to support the greater recovery of food waste.

TIMELINE FOR PHASE OUT



To align with international approaches, **intentionally added PFAS will be defined as a level of total fluorine (indicative of PFAS) above 100ppm**. If a business receives a testing result over the 100ppm limit, the business should work to find alternatives.

Testing

PRODUCT SCOPE

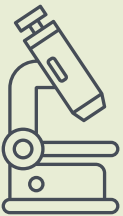
Fibre-based packaging is defined as packaging primarily made from plant-based fibre, including wood, bamboo and bagasse.

Food contact is defined as "direct food contact surfaces or materials (i.e. physically touching the food or in contact with headspace) that will be in contact with the food during normal use of the food packaging". Some examples of the packaging in scope are included in Table 1.

Table 1 Packaging applications of priority for Dec 2023 phase out of PFAS (non-exhaustive),¹

SECTOR	PRODUCT EXAMPLES	PACKAGING EXAMPLES
Pre-packed foods	Baked goods - muffins, cakes, biscuits	Boxes, muffin cases, greaseproof paper
	Butter	Wrap
	Microwave popcorn, crisps, cake mix, sweets	Bag
Food service	Pizza, hot chips, hamburgers	Boxes, cups, clamshells, wrap
	Sandwiches, salads	Paperboard wedges, boxes, wrap
	Various hot and cold foods	Plates, bowls, boats, trays, cups

TESTING DETAILS



Testing should be conducted via one of the **three key testing methodologies**:

1. Particle Induced Gamma Ray Emission
2. Combustion Ion Chromatography
3. Instrumental neutron activation analysis



If the packaging was **certified by the Australasian Bioplastics Association (ABA) for compostability after May 2021 to the AS 4736 or AS 5810 standard, there is no requirement for further testing** as the ABA have already included the phase out of PFAS as part of their certification post May 2021.



Labs should be compliant to ISO17025 and NATA accredited or internationally accredited (e.g. by an ILAC MRA signatory: CNAS, HOKLAS, IANZ). As of September 2022, the Australian Nuclear Science and Technology Organisation (ANSTO) offers two options for fluorine testing for businesses.



Reporting and alternatives

REPORTING

To track industry's progress in achieving the phase out of intentionally added PFAS in fibre-based food contact packaging by 31 December 2023, with provision for a stock run-out period within a reasonable timeframe (approximately 6-8 months), a [PFAS Phase Out Reporting Mechanism](#) has been set up.

The three proofs of testing for reporting are outlined on the right. Organisations can submit these where available, along with the PFAS Phase Out Reporting Mechanism, via an [online form](#).



Submit the PFAS Phase Out Reporting Mechanism via the online form.



Submit testing results via the online form.



Submit a Supplier/Manufacturer Declaration from your relevant suppliers via the online form.



Submit an ABA Certificate of Conformance (CoC) via the online form.

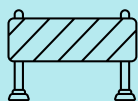
ALTERNATIVES

PFAS alternatives are primarily used as a barrier or repellent against grease, stains and water. Alternatives can be divided into two categories:

1. **A chemical alternative** - a 'drop-in substitute' that performs the same chemical function.



2. **A physical barrier approach** - a non-chemical alternative that confers repellence.



A key takeaway to consider when deciding on alternatives to PFAS is to ensure the problem is solved, not shifted.

Section 5 ('How: phase out and alternatives') of the action plan sets out certain criteria for assessing alternatives, and links to studies that identify a few known alternatives.

Guide for packaging manufacturers/suppliers/importers

For each item of fibre-based packaging placed on market in Australia (including final product, product family or raw material) there should be testing for total organic fluorine (indicative of PFAS) undertaken at some stage in the supply chain.

Packaging manufacturers/suppliers/importers are responsible for testing for, or confirming testing has been done for total organic fluorine in fibre-based food contact packaging place on market in Australia. If there is no testing done in the supply chain, then the packaging manufacturer/supplier/importer selling that packaging should conduct testing.

Open the action plan to navigate alongside



SITUATION	ACTION	ACTION PLAN GUIDE
Testing		
Packaging manufacturers/suppliers/importers should be testing for total organic fluorine (TOF - indicative of PFAS).	Packaging manufacturer/supplier/importer to test for TOF (PFAS).	Section 4.3
If your Australian packaging manufacturer/supplier/importer is testing.	Contact your packaging manufacturer/supplier/importer to determine if they are testing for TOF (PFAS). Refer your packaging manufacturer/supplier/importer to the action plan for reporting.	Send action plan
If your international packaging manufacturer/supplier/importer is testing.	Contact your packaging manufacturer/supplier/importer to determine if they are testing for TOF (PFAS) and gather test results.	Section 4.3
If your packaging has a current ABA Certificate of Conformance for compostability.	Contact the ABA to confirm your packaging has been certified post May 2021.	Section 4.3.3
Reporting		
If your packaging supplier has tested for TOF and is reporting.	Submit the PFAS Phase Out Reporting Mechanism, with Supplier Declaration provided.	Section 4.4 Supporting Documents - PFAS Supplier Declaration
If your international packaging supplier has tested for TOF, but not submitted a Report.	Submit the PFAS Phase Out Reporting Mechanism and testing results where possible.	Section 4.4 Supporting Documents - PFAS Phase Out Reporting Mechanism
If you have conducted your own TOF testing.	Submit the PFAS Phase Out Reporting Mechanism and testing results where possible.	Section 4.4 Supporting Documents - PFAS Phase Out Reporting Mechanism
If your packaging has a current ABA Certificate of Conformance (CoC) for compostability.	Submit a PFAS Phase Out Reporting Mechanism, and an ABA CoC.	Section 4.4 Supporting Documents - ABA CoC

Guide for packaging brand owners

For each item of fibre-based packaging placed on market in Australia (including final product, product family or raw material) there should be testing for total organic fluorine (indicative of PFAS) undertaken at some stage in the supply chain.

Brand owners should reach out to their packaging manufacturers/suppliers/importers to confirm if testing for total organic fluorine is being conducted. If there is no testing done in the supply chain and your packaging manufacturers/suppliers/importers have indicated they will not test, then the brand owner selling that packaging should conduct testing.

Open the
action plan
to navigate
alongside



SITUATION	ACTION	ACTION PLAN GUIDE
Testing		
Packaging manufacturers/suppliers/importers should be testing for total organic fluorine (TOF - indicative of PFAS).	Contact your packaging supplier/manufacturer/importer to determine if they are testing for TOF (PFAS).	Send action plan
If your packaging manufacturer/supplier/importer is testing.	No need for additional testing – follow reporting requirements.	Section 4.4
If your packaging manufacturer/supplier/importer is not testing.	Refer your packaging supplier/manufacturer/importer to the action plan and the industry-led voluntary phase out.	Send action plan
If your packaging manufacturer/supplier/importer has indicated they will not test.	Brand owners should conduct their own testing on their fibre-based food contact packaging.	Section 4.3
If your packaging has a current ABA Certificate of Conformance for compostability.	Contact the ABA to confirm your packaging has been certified post May 2021.	Section 4.3.3.
Reporting		
If your packaging supplier has tested for TOF and is reporting.	Submit the PFAS Phase Out Reporting Mechanism and testing results or a Supplier Declaration where possible.	Section 4.4 Supporting Documents - PFAS Supplier Declaration PFAS Phase Out Reporting Mechanism
If your packaging supplier has tested for TOF but is not reporting.	If they are domestically based, refer them to the Action Plan to report. Submit the PFAS Phase Out Reporting Mechanism and testing results or a Supplier Declaration where possible.	Section 4.4 Supporting Documents - PFAS Supplier Declaration PFAS Phase Out Reporting Mechanism
If you have conducted your own TOF testing.	Submit the PFAS Phase Out Reporting Mechanism and testing results where possible.	Section 4.4 Supporting Documents - PFAS Phase Out Reporting Mechanism
If your packaging has a current ABA Certificate of Conformance (CoC) for compostability.	Submit a PFAS Phase Out Reporting Mechanism, and an ABA CoC.	Section 4.4 Supporting Documents - ABA CoC PFAS Phase Out Reporting Mechanism

Further information



To contact APCO, please visit our website
apco.org.au

