



Emily Miles, CEO  
Food Standards Agency  
Floors 6 and 7, Clive House, 70 Petty France, London SW1H 9EX

24<sup>th</sup> October 2019

Dear Emily Miles,

I am writing to you on behalf of CHEM Trust, an environmental NGO which focuses on chemicals policy and human health and the environment. We are writing to ask what action you are taking on the newly revised tolerable weekly intake of perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) – as has been recommended by the European Food Safety Authority (EFSA) Panel on Contaminants in the Food Chain (CONTAM).

Based on the review of over 200 epidemiological studies, CONTAM recommended a new Tolerable Weekly Intake (TWI) for PFOS and PFOA<sup>1</sup>. These are:

- PFOS TWI = 13 ng/kg bw/week;
- PFOA TWI = 6 ng/kg bw/week.

The new TWI are 80 times lower for PFOS and 1750 times lower for PFOA compared to the previous opinion, which was published in 2008<sup>2</sup>.

These new TWIs are of great importance to human health as CONTAM concluded that “*For both compounds, exposure of a considerable proportion of the population exceeds the proposed TWIs.*”<sup>1</sup>.

In 2014, the UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) performed a risk assessment on infant exposure to PFOS via diet<sup>3</sup>. It estimated the exposure of infants via breastmilk to be between 7.6 to 59 ng/kg bw/day or 53 to 413 ng/kg bw/week (4 to 32 times the new EFSA TWI), and exposure via infant formula between 9 to 70 ng/kg bw/day or 63 to 490 ng/kg bw/week (5 to 38 times the new EFSA TWI).

These data suggest that babies in the UK might be exposed to levels of PFOS exceeding what has been recommended as safe by experts of the CONTAM panel.

<sup>1</sup> EFSA, 2018. Risk to human health related to the presence of perfluorooctane sulfonic acid and perfluorooctanoic acid in food. <https://www.efsa.europa.eu/en/efsajournal/pub/5194>

<sup>2</sup> In 2008, EFSA recommended the following Tolerable Daily Intakes (TDI): PFOS TDI = 150 ng/kg bw/day; PFOA TDI = 1,500 ng/kg bw/day.

EFSA, 2008. EFSA opinion on two environmental pollutants (PFOS and PFOA) present in food.

<https://www.efsa.europa.eu/en/press/news/080721>

<sup>3</sup> Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment, 2014. COT statement on the potential risks from perfluorooctane sulfonate (PFOS) in the infant diet. COT Statement 2014/02.

<https://cot.food.gov.uk/sites/default/files/cot/cotstatmpfos.pdf>

#### Trustees

Oliver Smith (Chair)  
Nigel Haigh OBE  
Leslie Jones OBE  
Colin Church  
Debbie Tripley  
Sarah Oppenheimer

CHEM Trust  
34b York Way  
London  
N1 9AB, UK  
[www.chemtrust.org](http://www.chemtrust.org)  
[askchemtrust@chemtrust.org](mailto:askchemtrust@chemtrust.org)  
Twitter: @CHEMTrust

The UK COT has yet to revise the PFOS and PFOA TDIs. The recommendations from 2009 are still in place<sup>4</sup>, with the PFOS TDI (300 ng/kg bw/day) being already twice the value recommended by EFSA in its previous 2008 opinion (150 ng/kg bw/day)<sup>2</sup>, 10 times the value recommended by the Danish EPA in 2015 (30 ng/kg bw/day)<sup>5</sup> and 15 times the value recommended by the US EPA in 2016<sup>6</sup> and Food Standards Australia New Zealand in 2017<sup>7</sup> (20 ng/kg bw/day). This is why we are calling on the FSA to take action.

Moreover, PFOS and PFOA are just two out of several thousands of per- and polyfluorinated alkyl substances (PFAS)<sup>8</sup>. They are the most studied and are already largely restricted. Evidence is mounting regarding the threat posed by other PFAS found in increasing concentrations in the environment and in people's bodies<sup>9</sup>.

We also want to draw your attention to the fact that Denmark is preparing a national ban on all PFAS in paper and cardboard used in food contact materials by July 2020<sup>10</sup>.

**In light of this information, CHEM Trust is asking the FSA:**

- **To reassure us that COT is discussing the new EFSA recommendations and will be revising the advice in the UK to be in line with the most up to date science.**
- **To let us know what action you are taking to explore reduction measures for a better protection, including a ban on PFAS in paper and card food contact materials in the UK.**

We look forward to hearing from you about both of the issues raised. If you have any further questions, please don't hesitate to get in touch.

Yours sincerely,



Dr Michael Warhurst  
Executive Director  
CHEM Trust  
michael.warhurst@chemtrust.org

*In view of the public interest in this matter, we intend to make this letter publicly available.*

---

<sup>4</sup> Committee on toxicity of chemicals in food, consumer products and the environment, July 2009. Update statement on the tolerable daily intake for perfluorooctanoic acid. COT statement 2009/02.

<https://cot.food.gov.uk/sites/default/files/cot/cotstatementpfoa200902.pdf>

<sup>5</sup> Danish EPA (Danish Environmental Protection Agency), 2015. Perfluoroalkylated substances: PFOA, PFOS and PFOSA. Evaluation of health hazards and proposal of a health based quality criterion for drinking water, soil and ground water. Environmental project No. 1665, 2015. 90 pp. <https://www2.mst.dk/Udgiv/publications/2015/04/978-87-93283-01-5.pdf>

<sup>6</sup> US EPA (United States Environmental Protection Agency), 2016. Health Effects Support Document for Perfluorooctane Sulfonate (PFOS), EPA, May 2016. [https://www.epa.gov/sites/production/files/2016-05/documents/pfos\\_hesd\\_final\\_508.pdf](https://www.epa.gov/sites/production/files/2016-05/documents/pfos_hesd_final_508.pdf)

<sup>7</sup> FSANZ (Food Standards Australia New Zealand), 2017. Hazard assessment report–Perfluorooctane sulfonate (PFOS), Perfluorooctanoic acid (PFOA), Perfluorohexane sulfonate (PFHxS). 164 pp.

<https://www1.health.gov.au/internet/main/publishing.nsf/content/ohp-pfas-hbgv.htm#FSANZ>

<sup>8</sup> Toward a new comprehensive global database of per-and polyfluoroalkyl substances (PFASs). [OECD, 2018](#).

<sup>9</sup> Blum, A., et al., 2015. The Madrid statement on poly-and perfluoroalkyl substances (PFASs). Environmental health perspectives, 123, 5, pp. A107-A111. <https://doi.org/10.1289/ehp.1509934>

<sup>10</sup> Food Packaging Forum, 2019. Denmark to ban PFAS in paper & board in 2020. 3 September 2019. <https://www.foodpackagingforum.org/news/denmark-to-ban-pfas-in-paper-board-in-2020>