



## TPCH publishes the Model Toxics in Packaging Legislation Guidance

In November 2023, TPCH (Toxics in Packaging Clearinghouse) published guidance on the Model Toxics in Packaging Legislation to support the implementation of phthalate and PFAS requirements.

The guidance states that the best source of information about the presence of intentionally added PFAS may be the manufacturer or supplier of the packaging, and recommends the following three ways to confirm whether a product contains PFAS:

1. Require suppliers to provide complete material disclosure;
2. Require suppliers to disclose whether PFAS has been intentionally added (if complete material disclosure cannot be provided);
3. Look for third-party certification.

While total fluorine (TF) or total organic fluorine (TOF) levels below 100 ppm are generally considered by laboratories and standards bodies to have not intentionally added PFAS to food packaging, the guidelines state that regardless of the total fluorine (TF) or total organic fluorine (TOF) levels tested, Manufacturers should confirm with their suppliers that they do not intentionally add PFAS.

The guidelines also recommend testing for phthalates using SW 846 method 8270 and EPA method 3541, and list some of the phthalates that are commonly tested using the above methods:

No.	Substance	CAS No.
1	Bis(2-ethylhexyl)phthalate (DEHP)	117-81-7
2	Butyl benzyl phthalate (BBP)	85-68-7
3	Dicyclohexyl phthalate (DCHP)	84-61-7
4	Diethyl phthalate (DEP)	84-66-2
5	Diisobutyl phthalate (DIBP)	84-69-5
6	Diisodecyl phthalate (DIDP)	26761-40-0
7	Diisononyl phthalate (DINP)	28553-12-0
8	Dimethyl phthalate (DMP)	131-11-3
9	Di-n-butyl phthalate (DBP)	84-74-2
10	Di-n-hexyl phthalate (DNHP)	84-75-3
11	Di-n-octyl phthalate (DNOP)	117-84-0
12	Dipentyl phthalate (DPP/DPENP)	131-18-0

Finally, the guidelines recommend that product manufacturers, brand owners, and retailers who use compliant packaging materials:

1. Require all suppliers to provide compliance certificates for all packaging materials and their components;
2. Ask about the criteria used to determine compliance;
3. if the material formula changes, the supplier needs to update the information;
4. according to their own packaging supply chain information to prepare their own compliance certificate, and determine the appropriate authorized signatories;
5. Keep records indefinitely.

Original link: [Guidance](#)