



APCO's action plan, driven by the National PFAS Position Statement, sets out a voluntary approach to phase out per- and polyfluoroalkyl substances (PFAS) in fibre-based food contact packaging in Australia. This action plan outlines a national, industry-led approach to manage the elimination of intentionally added PFAS in fibre-based food contact packaging in Australia by the 31st of December 2023 (with a provision for a stock run-out period of approx. 6months) through phase out actions.

APCO have stated that products with total fluorine, total organic fluorine, or extractable organic fluorine levels above 100 parts per million (ppm) will be considered to have intentionally added PFAS, anything under 100ppm will be considered as unintentional. Confoil has undertaken a process in collaboration with our supply chain partners to determine if PFAS has been intentionally added into any of the material, products, or substances we use.

As part of this wide examination Confoil has tested materials and products and is continuing to work with our suppliers to confirm that PFAS is not intentionally added in anything they provide. Completed testing has been done via accredited labs following the established APCO testing methodology (PIGE, INAA or CIC). Confoil has voluntarily submitted the results of the testing and confirmed details from our suppliers with APCO and customers as part of the Action Plan.

The majority of Confoil's fibre-based packaging has been confirmed to not have intentionally added PFAS. However, the results of testing and supplier confirmation have shown that the following lines contain a greater than 100ppm concentration of PFAS:

Product Type	PFAS Results
Butter Wrap – Greaseproof Parchment Paper Version	Greater than 100ppm
Butter Wrap – Linflex Composite (Foil, Plastic and Greaseproof paper)	Greater than 100ppm
Pulp Produce Trays – Wheatgrass	Greater than 100ppm
Pulp Meal Trays – PET lined Wheatgrass	Greater than 100ppm

It has been found that a significant number of similar products on the Australian market have intentionally added PFAS to help these products achieve high levels of grease and water resistance.

Replacement options for the pulp produce trays and pulp meal trays, that do not have intentionally added PFAS, have been identified. All lines of the current stock should be replaced by mid-2024, with most lines being replaced before this.

We have also started trials on 2 new butter wraps to replace the greaseproof parchment paper version. Details on the new option and the replacement timeline will be announced shortly. New options for the Linflex composite butter wrap are being examined with trials to begin soon.

As a long running member of APCO we are dedicated to ensuring that PFAS does not become a barrier to realising the 2025 National Packaging Targets and will continue to collaborate and innovate to achieve the goal. If you have any queries, please do not hesitate to contact Confoil to discuss further.