

Coop Danmark welcomes the proposal to restrict all PFAS as a group

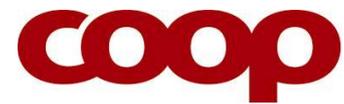
Coop Danmark strongly supports the restriction proposal. This document presents our comments to the annex XV restriction proposal on PFAS.

The restriction proposal is essential. Chemical pollution is one of the main planetary crises and scientist suggest that PFAS in the environment represent a planetary boundary that has now been exceeded (Food Packaging Forum 2022). PFAS are extremely persistent and are harmful to human health. PFAS already contaminate our drinking water and food. PFAS also contributes to biodiversity loss (Sigmund et al 2023) and F-gases harm our climate. We need to address the problem with PFAS to stand resilient and competitive in the future, and no real change will happen fast enough without strict legislation. The PFAS restriction will also make it possible to safely recycle resources and enable a circular economy.

Based on the key concerns in the Helsingør Statement in 2014 (Scheringer et al 2014) we applied a precautionary principle in Coop Danmark. Since then, we have continuously worked to phase out PFAS and shifted our production away from them. We have learned over the years that it is possible to produce packaging and goods without PFAS, often without quality impairments or notable price increases. It is also our experience that, when you ban PFAS or other harmful chemicals, positive innovation happens. We have banned PFAS in e.g. packaging made of paper and board, cosmetics and personal care products, textiles, outerwear, shoes, home textiles and finally we offer our customers a broad assortment of PFAS-free frying pans and bakeware.

Coop Danmark's key messages on the proposal to restrict all PFAS as a group

- 1. It is possible to ban PFAS in paper and board at no extra cost and at the same time increase customer loyalty.** In 2015 Coop Denmark banned PFAS in food packaging made of paper and board. We took microwave popcorn of the market because it was not possible to obtain popcorn bags without PFAS. The withdrawal of microwave popcorn resulted in massive media coverage, with more than a hundred positive press cuttings. Later, we were the world's first retailer to launch microwave popcorn in PFAS-free bags. Alternatives to PFAS in paper and board packaging are available, but often surface treatment chemicals are not necessary - e.g. in popcorn and paper bread bags. We have not experienced price increases switching to PFAS-free packaging (Department of Food and Resource Economics, University of Copenhagen 2015). In our experience packaging makes up such a small part of the total product price that it has no or very little influence.
- 2. Alternatives to PFAS in textiles are available, but further innovation is needed.** In 2015 Coop Denmark banned PFAS in textiles impregnation and switched to alternative impregnating agents, such as e.g. Bionic finish. Alternatives do not match PFAS-based repellents on all technical parameters (Danish Ministry of Environment 2015), but they represent viable alternatives to everyday consumer to move beyond the conventional use of PFAS and to continue taking steps to design and create innovative solutions and safer alternatives.



3. **PFAS are not essential in cosmetics and personal care products.** Coop Danmark has never allowed PFAS in cosmetics and personal care products sold under our private labels. Due to the increased concern about PFAS, we also decided to ban PFAS in cosmetics and personal care products from all branded trademarks in 2019. We struggled with large well-known brands, but today none of our marketed cosmetics or personal care products contain PFAS.
4. **Food contact materials – PFAS in frying pans and bakeware.** Since PFAS is firmly bound in the coating in frying pans and bakeware, we have not prioritized a PFAS ban in these products. However, we are aiming to phase out PFAS from these products as well, and we experience an increased demand for PFAS-free food contact materials.
5. **It is expensive and resource demanding to be first mover.** In Coop Danmark we feel an obligation to phase out and replace chemicals that are under suspicion for negatively impacting health or the environment. However, it is expensive and resource demanding to exceed legislative requirements. First of all, it can be challenging and time consuming to find PFAS-free alternatives in the market. Moreover, Coop Danmark expend extra resources on compliance e.g., explaining our test setup to suppliers and documenting products are PFAS-free. Getting suppliers to understand and comply with our requirements can be a challenge and not infrequently we find goods in our random sample testing that do not meet our requirements. A more restrictive legislation will not only benefit human health and the environment, but it will also remove an unnecessary compliance burden for responsible companies.
6. **PFAS-free alternatives can be a market opportunity and innovation may create new jobs.** If Europe and the European companies lead the transition to PFAS-free alternatives Europe may become the global leader on the market, where there is a growing demand for PFAS-free products. Also, innovation in PFAS-free products may create new jobs.

About Coop Danmark

Coop Danmark is a nationwide danish retailer with approximately 1,000 retail stores, a market share of 30% and 46 billion DKK in yearly turnover. Coop is owned by 1.9 million members and is a community based on responsibility, diversity, and involvement. Coop Danmark fight for a better and more sustainable everyday life for consumers.

For further information, please contact:

Thomas Roland, Head of department, Coop Sustainability and Quality
+ 45 30 91 92 42, thomas.roland@coop.dk

References

Danish Ministry of Environment (2015). Alternatives to perfluoroalkyl and polyfluoroalkyl substances (PFAS) in textiles. Survey of chemical substances in consumer products No. 137.

<https://www2.mst.dk/Udgiv/publications/2015/05/978-87-93352-16-2.pdf>

Department of Food and Resource Economics, University of Copenhagen (2015). Erhvervsøkonomiske konsekvenser ved en national grænseværdi for indhold af totalt organisk bundet fluor i fødevarekontaktmaterialer.

<https://www.ft.dk/samling/20142/almdel/MOF/spm/84/svar/1263934/1547471.pdf>

Scheringer, M., Trier, X., Cousins, I. T., Voogt, P. d., Fletcher, T., Wang, Z., Webster, T. F. (2014). Helsingør Statement on poly- and perfluorinated alkyl substances (PFASs). *Chemosphere*, 114, 337-339.

Sigmund, G., Ågerstrand, M., Antonelli, A., Backhaus, T., Brodin, T., Diamond, M. L., Erdelen, W. R., Evers, D. C., Hofmann, T., Hueffer, T., Lai, A., Torres, J. P. M., Mueller, L. Perrigo, A. L., Rillig, M. C., Schaeffer, A., Scheringer, M. Schirmer, K., Tlili, A. ... Groh, K. J. (2023). Addressing chemical pollution in biodiversity research. *Global Change Biology*, 29, 3240-3255.

Food Packaging Forum (2022). Research defines PFAS planetary boundary and calculates human health costs. <https://www.foodpackagingforum.org/news/research-defines-pfas-planetary-boundary-and-calculates-human-health-costs>