

# FY 2025

# ANNUAL REPORT

## TOXICS IN PACKAGING CLEARINGHOUSE

The Toxics in Packaging Clearinghouse maintains the Model Toxics in Packaging Legislation and coordinates implementation of state legislation on behalf of its member states, with the goal of promoting consistency across states.



**TOXICS IN PACKAGING  
CLEARINGHOUSE**



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Prepared By:

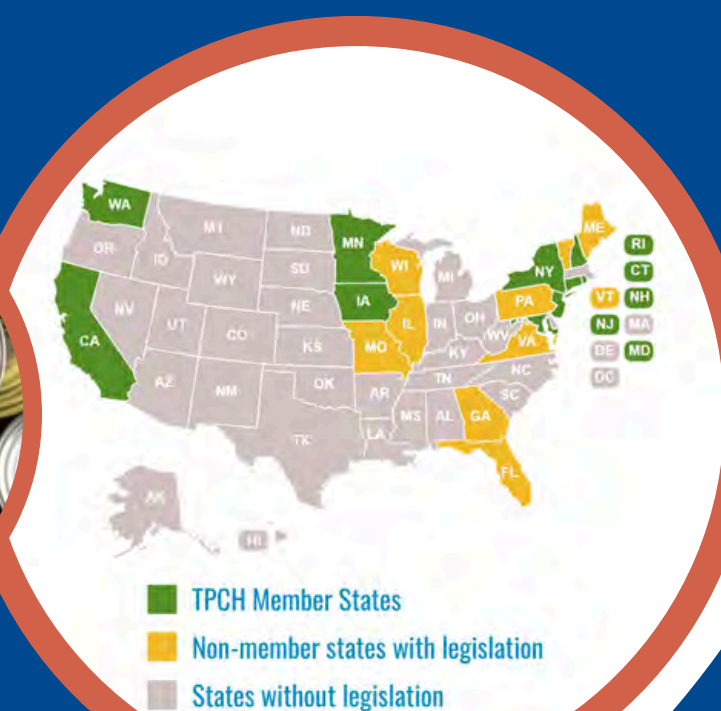
**John Fay, TPCH Project Manager**

# TPCH Purpose and Membership

The Toxics in Packaging Clearinghouse (TPCH) maintains Model Toxics in Packaging Legislation, originally developed in 1989 to reduce the amount of lead, mercury, cadmium, and hexavalent chromium in packaging and packaging components that are sold or distributed throughout the United States. To date, the Model has been adopted by nineteen U.S. states, including: California, Connecticut, Florida, Georgia, Illinois, Iowa, Maine, Maryland, Minnesota, Missouri, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, and Wisconsin.

In 2021, TPCH updated the model legislation to include the class of perfluoroalkyl and polyfluoroalkyl substances (PFAS) and ortho-phthalates as regulated chemicals, as well as new processes and criteria for identifying and regulating additional chemicals of high concern in packaging.

TPCH coordinates implementation of state legislation based on the Model on behalf of its member states with the goal of promoting consistency across states. TPCH is located at the Northeast Waste Management Officials' Association (NEWMOA) based in Boston, Massachusetts. NEWMOA manages and performs all administrative functions for the Clearinghouse on behalf of member states.



# Note from the Chair

In 2025, the Toxics in Packaging Clearinghouse continued its primary mission to administer the joint provisions of the members' Toxics in Packaging laws while addressing new laws concerning PFAS in food packaging and keeping an eye toward the future of toxics in packaging.

Since its formation in the early 1990s, TPCH has focused on the core toxics of lead, cadmium, mercury and hexavalent chromium. TPCH organized a screening project in Connecticut in May, testing dozens of suspect packages. The screening confirmed similar tests done in New Jersey and California finding high amounts of lead in a peanut butter jar imported from Mexico. New Jersey DEP has taken the lead in enforcement of this case.

2025 also saw the TPCH expand its reach to PFAS in food packaging. Despite the challenges of the PFAS laws, the clearinghouse began to formulate a collaborative strategy for administering this law including prioritizing packages, and determining how to define "intentionally added."

Extended Producer Responsibility laws addressing toxicity in packaging passed in member states Minnesota, California, Maryland and Washington in 2025. TPCH members are developing a strategy for being a partner in addressing toxicity in packaging in member states and others through our existing authority and processes. Outreach to states with packaging EPR and their stewardship organizations will be a focus for 2026.

TPCH will continue to be the go-to organization to represent states in administration of the array of toxics in packaging laws.

TPCH Chair  
**Tom Metzner, Connecticut DEEP**



# FY 2025 Highlights



Tom Metzner and John Fay presented at Chemical Watch's **Food Contact North America Conference**, Oct 1, 2025  
*"Highlights from TPCH's Workgroup on PFAS in Food Packaging"*

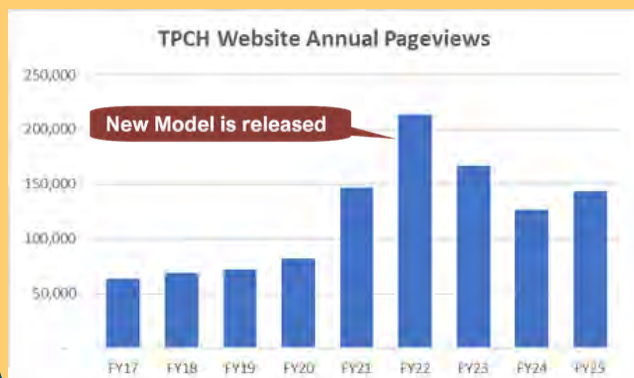
**2025 TPCH & IC2\* PFAS IN FOOD PACKAGING WORKGROUP**

- Subcommittee form states with impleme PFAS in food packag
- Meet monthly, 6 tim
- Topics included
  - Current and poten
  - The COC process

**65**

Inquiries answered from the regulated community

**Website Visitors:  
142,000 in 2025**



## 2025 Multi-State Screening Project



**>175  
Packages  
Screened**

## PFAS in Packaging Workgroup



**Exploring  
Food Packaging  
Compliance**



# Administration & Resources

2025 Membership	
California DTSC:	Laurie Stephey
Connecticut DEEP:	Tom Metzner*
Iowa DNR:	Kathleen Hennings*
Maryland MDE:	Brandon Carter
Minnesota MPCA:	John Gilkeson*
New Hampshire DES:	Ann Astarita
New Jersey DEP:	Emily DeMaio*
New York State DEC:	Conor Shea
Rhode Island DEM:	Michele McCaughey*
Washington ECY:	Kathleen Gilligan
Glass Packaging Institute:	Scott DeFife
AMERIPEN	Rob Keith

\* Executive Committee 23-25

## TPCH Administration

The Toxics in Packaging Clearinghouse is managed by the Northeast Waste Management Officials' Association (NEWMOA). NEWMOA is the fiscal agent and manages all aspects of the organization, including coordination and facilitation of monthly virtual meetings with members, the Executive Committee planning meetings, and the annual meeting held each fall.

## Quick Links to the most popular resources

- The [Model Toxics in Packaging Legislation](#)
- Sample [Certificates of Compliance](#)
- Toxics in Packaging [Fact Sheet](#)
- [Guidance Document](#) for the 2021 Model Update

**10 State Members**  
**1 Advisory Member**  
**\$42,000 annual budget**

# Looking Ahead

## PFAS in Packaging Workgroup

TPCH, in coordination with NEWMOA's Interstate Chemicals Clearinghouse (IC2), will be developing a guidance document for compliance with the "intentional addition" provisions of state PFAS in food packaging laws.

## Coordinating State Screening Activities

In 2026, several states will be conducting screening programs to assess compliance with their toxics in packaging laws. TPCH will be assisting with coordination of those efforts and providing unified outreach to suppliers and manufacturers as needed.

## Emerging Substances of Concern

Although the toxics in packaging Model Legislation does provide language that allows states to add emerging substances of concern into regulation, TPCH will be assessing whether or not to update the Model to include additional specific chemicals and requirements particular to their toxicity and characteristics.

