

Melissa Nadeau

From: Jiang, Joey (Shanghai) <Joey.Jiang@sgs.com>
Sent: Monday, July 20, 2020 9:23 PM
To: Melissa Nadeau
Subject: Enquiry on TPCH updates TO STRENGTHEN MODEL LEGISLATION ON TOXICS IN PACKAGING
Attachments: TPCH-Call-for-Comments-for-Model-Legislation-Update-2020.pdf

Dear Sir/Madam of TPCH:

We noticed that the Toxics in Packaging Clearinghouse (TPCH) announced on 9th, July, 2020 that it is seeking comments on the organization's draft update to their Toxics in Packaging Model Legislation.

In addition to maintaining the regulated four heavy metals, the proposal contains several important provisions for packaging and packaging components:

- Prohibiting intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS)
- Restricting intentionally added ortho-phthalates (commonly known as phthalates) to no more than 100 ppm (0.01%)
- Detailing the criteria for the identification and prohibition of packaging chemicals of high concern

Comments on the draft update will be accepted until August 24, 2020

For the phthalates and PFAS, since no specific phthalates and PFAS are defined in this updated legislation, may we know that is there any recommendation or guideline from TPCH on defining specific phthalates and PFAS for testing to comply with the new coming TPCH legislation since there are too many phthalates and PFAS in the world and it is technically impossible to test all of them

Looking forward to your response and thanks in advance

Thanks and Best Regards

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