



National Association of Printing Ink Manufacturers 529 14th Street NW
Suite 1280, Washington, DC 20045 USA

Revised: November 2022

Subject

Coalition of Northeast Governors Toxics in Packaging Clearinghouse Model Legislation (CONEG) – 2021 Update - Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

Overview

The 2021 update to the CONEG legislation adds perfluoroalkyl and polyfluoroalkyl substances (PFAS) to its list of prohibited chemicals in packaging. This prohibition applies to the “intentional introduction”² of this substance into packaging and packaging components.

*PFAS*¹

PFAS as defined by the 2021 CONEG Update are used in printing ink formulations. In addition, some fluorinated compounds used in printing inks may contain residual, trace concentrations of other fluorinated substances. Accordingly, the CONEG definition of “intentional introduction”² would generally apply to PTFE waxes or other, related substances used in printing inks.

Effective Date: February 16, 2021

Background

In February 2021, the [Toxics in Packaging Clearinghouse](#) (TPCH) announced the organization’s 2021 [update to their Model Toxics in Packaging Legislation](#). The update includes the addition of 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.

Definitions

¹*Perfluoroalkyl and polyfluoroalkyl substances (PFAS)* means all members of the class of fluorinated 100 organic chemicals containing at least one fully fluorinated carbon atom.

² *Intentional Introduction* means the act of deliberately utilizing a regulated chemical in the formation of a package or packaging component where its continued presence is desired in the final package or packaging component to provide a specific characteristic, appearance, or quality.

Please contact the NAPIM office at (815) 708-7387 if you have questions or comments.