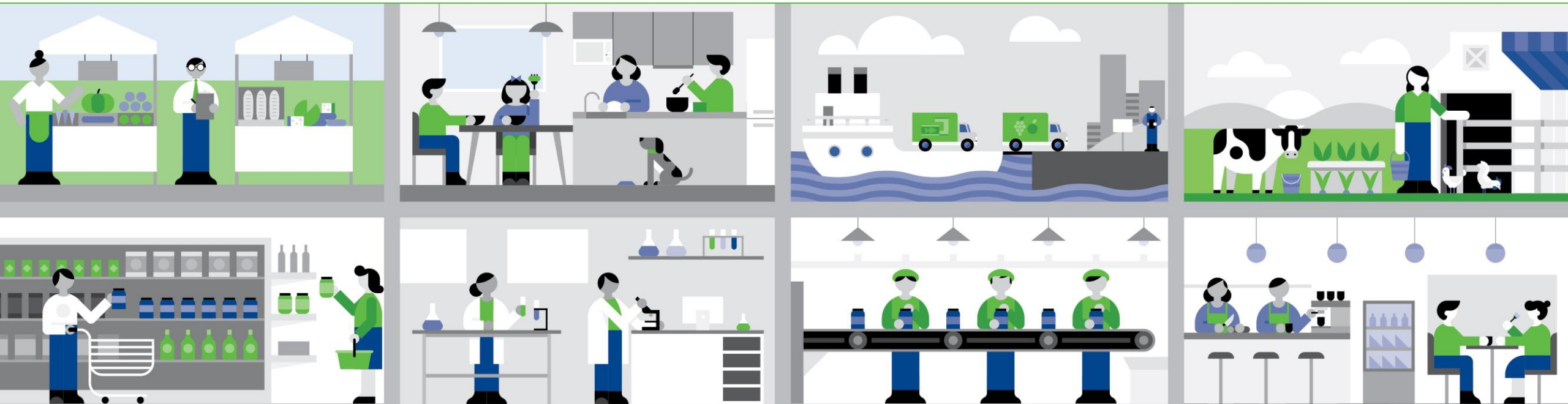


# PFAS: Sampling and Analysis of FCMs

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# Complex Legislative Landscape

- **EU Chemicals Policy**, implemented restrictions on production/ use of PFAS, in particular PFOS, PFHxS, PFOA and C9-14 PFCAs (their salts & related substances)
- **Many PFAS classified** as substances of very high concern under REACH, [Regulation \(EC\) 1907/2006](#) with specific restriction on PFHxA from April 2026 – *paper/cardboard used as FCM within scope Regulation 1935/2004*.
- [Regulation \(EU\) 2019/1021](#) on persistent organic pollutants.
- **Universal PFAS Restriction Proposal** Five authorities (SW, DE, NO, DK, NL) updated PFAS restriction proposal - [ECHA](#) (14.10.2025)
- **EFSA updated risk assessment** for PFAS in food in [2020](#) establishing a group tolerable weekly intake (TWI) of 4.4 ng/kg.bw/week for the sum of PFOS, PFOA, PFNA and PFHxS.
- [Recommendation \(EU\) 2022/1431](#) on PFAS monitoring in food for occurrence data for foods, relevant for the human exposure and supporting dietary exposure assessment and need to regulate PFASs in specific foods.
- **Max levels** have also been set for PFOS, PFOA, PFNA, PFHxS in certain foods of animal origin under [Regulation 2023/915](#) on maximum levels for certain contaminants in food.
- **No specific max levels** set for PFAS in FCMs.
- [Regulation \(EU\) 10/2011](#) - Some PFAS related substances authorised under plastics regulation
- [PPWR 2025/40](#) will from 12.08.2026 ban PFAS in food-contact packaging at certain threshold levels.
- [Directive \(EU\) 2020/2184](#) - Drinking Water Directive sets limits for PFAS. MS must ensure compliance by 12.01.2026.

# Sampling

- **Sample Type** – FCM samples collected as part of planned work to determine levels of PFAS.
- **Sample Source** – Samples taken from retailers, restaurants and coffee shops. Both branded and non-branded products taken.

## Analysis Performed: Extraction Study <sup>1-2</sup>

- **Purpose:** To identify and quantify the total amount of extractable PFAS substances present in the sampled FCMs.
- **Process:** The material subjected to extraction methods designed to pull out as many PFAS substances as possible and to characterise those PFAS substances present in the FCM.
- **Outcome:** Provide a profile of all extractable PFAS substances, which helps with method development, occurrence data for PFAS in FCMs, risk assessment, training and industry guidance.

<sup>1</sup> Extraction studies are not necessarily representative of actual consumer exposure, since conditions are more severe than real use.

<sup>2</sup> Migration studies simulate worse case conditions to understand what actually *migrates* into food, while extraction studies use aggressive conditions to see what *could potentially* come out of an FCM.



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