

Position on Fluorinated Chemicals

BPI's overarching goal is to assist in the diversion of organic waste to composting, by verifying that products and packaging will completely break down in a professionally managed composting facility, without harming the quality of that compost. Our certification program is based on ASTM's scientific pass/fail standards, set by consensus, which include biodegradation testing of individual components, heavy metals limits, and ecotoxicity testing. BPI prohibits all carcinogens, reproductive toxins, and PBTs, utilizing authoritative lists like Prop 65.

Due to the growing environmental concerns around fluorinated chemicals, often referred to as perfluorinated or polyfluorinated alkyl substance as a class of chemicals, BPI has participated in high-level working groups such as the Green Chemistry Council in 2017. Peer reviewed scientific data is still emerging, but preliminary reports show levels of possible bioaccumulation of some fluorinated chemistries in plants and humans, using biosolids compost as an input. It is also known that the more bioaccumulative form of fluorinated chemicals were phased out by law at the end of 2016. Thus, older data may not be appropriate as compared to data generated this year.

BPI hired a technical advisor in 2017 to assist on this topic, and last Fall the BPI Board brought a vote to the membership about restricting and eventually eliminating fluorinated chemicals from the certification. Specifically, the proposal was to adopt the EN 13432 limit of 100ppm total fluorine in 2019, and a statement of "no intentionally added fluorinated chemicals" shortly thereafter. The vote passed, and the following is an outline of key milestones to focus on throughout the transition period.

- **March 31, 2019** – All companies must submit total fluorine tests on certified products from an approved lab. All standardized total fluorine test methods are currently accepted, but the samples must be prepared via a process of digestion, and not extraction.
- **June 30, 2019** – DIN CERTCO reviews tests, and BPI notifies companies that haven't submitted tests about certifications being discontinued.
- **September 30, 2019** – BPI notifies companies of the test results. For passing results, BPI sends reminders of the upcoming requirement for companies to sign a statement indicating that "no fluorinated chemicals have been intentionally added" to any of their BPI certified products. For non-passing results, BPI and companies will establish plans for managing existing inventory items featuring "BPI certified" logos, messaging or both.
- **December 31, 2019** – Companies to confirm that inventory with over 100 ppm will no longer be labeled or marketed as BPI certified, and that failure to do so will result in notification from BPI's lawyer.

We strongly encourage BPI Members to do this testing as soon as possible, and to submit results ahead of the March 31, 2019 deadline. The total fluorine test can be requested as an add-on to the Metals test if you are in the process of certifying or re-certifying and can also be ordered on its own.

Until March 31, 2019, companies are still permitted to certify and re-certify products containing fluorinated chemicals but will be notified when applying that failure to comply with the 100 ppm requirement by March 31, 2019 will result in that certificate expiring **December 31, 2019**, rather than the standard three-year licensing period.