

A PFAS FOOD RECALL: THE START OF SOMETHING BIG?



Mark McDaniel, CPG Expert

Those of us in the food safety world—especially chemists like me—knew this was coming: the <u>first</u> <u>U.S. Food and Drug Administration recall of food for PFAS contamination</u>. It was a voluntary recall by Bumble Bee on July 6 for Smoked Clams. The recall is solely for 3.75-ounce cans of Bumble Bee Smoked Clams with the UPC Label 8660075234, which came from a third-party manufacturer in China. The FDA <u>tested 81 seafood products</u> for PFAS in a limited survey. While many products had detections for various PFAS, the FDA determined that the estimated exposure to perfluorooctanoic acid (PFOA) in 3.75-ounce cans of Bumble Bee Smoked Clams presented a potential health hazard.

FDA Recall Database search for PFAS:

| Date 🗢 | Brand Name(s) 🗢 | Product Description 🗘 | Product Type 🗢 | Recall Reason Description 🗢 | Company Name 🗢 | Terminated Recall | Excerpt |
|------------|---------------------------------|--------------------------|-----------------------------------|---|--------------------------|----------------------|---|
| 07/06/2022 | <u>Bumble Bee</u> Foods, LLC | Smoked Clams | Food & Beverages, Shellfish | Contains Per- and polyfluoroalkyl substances (PFAS) | Bumble Bee Foods, LLC | | smoked clams after FDA testing found |

Is this an indication of things to come? Quite possibly, especially as the toxicology around PFAS becomes better understood and as regulators and the public take more notice. For example, more PFAS chemicals will be assigned lifetime dose toxicology values and Maximum Contaminant Levels (MCLs) for drinking water. This will likely result in additional PFAS-related food recalls. Last month, the EPA released interim Lifetime Health Advisory Levels for four PFAS:

| Chemical | Minimum Reporting Level (ppt) | Lifetime Health Advisory Level (ppt) |
|----------------|-------------------------------|--------------------------------------|
| PFOA | 4 | 0.004 (Interim) |
| PFOS | 4 | 0.02 (Interim) |
| GenX Chemicals | 5 | 10 (Final) |
| PFBS | 3 | 2,000 (Final) |

So, just what is the potential for PFAS in food ingredients or packaging, and will that translate to a greater risk exposure for a recall? Although there are many variables in play, AlterEcho is advising clients that the risk of PFAS exposure in food packaging is real and is only likely to increase, thus necessitating increased efforts to avoid PFAS in packaging as much as possible. As one of AlterEcho's lead toxicologists, Dr. Ann Schnitz pointed out in a recent White Paper, three states have already banned PFAS in food packaging, while 10 others are mulling legislation to either ban or reduce them. "Lawsuits against major fast food chains," Ann writes, "have accelerated public awareness of the potential for human exposure, and may influence the trajectory of PFAS removal."

Regulators, consumers, lawyers: they are all sounding the alarm on PFAS in food—and it's an alarm that is probably only going to get louder.

Mark McDaniel, is a Certified Professional Analytical Chemist with more than two decades of expertise supporting clients in areas of laboratory and field chemistry, emergency response and sustainability. He is an expert in developing and reviewing analytical chemistry methods, with broad expertise in state environmental regulatory programs, including work involving emerging contaminants such as PFAS and 1,4-Dioxane. He works regularly with Consumer Packaged Goods (CPG) clients at AlterEcho, addressing the growing demand for professional consulting services centered on safety and stewardship—particularly in the production and distribution of food and drink products.. He is based in Golden, Colorado.