



Know your environment.
Protect your health.

Feb. 1, 2017

The Environmental Working Group is a nonprofit research and advocacy organization whose work for 25 years has focused on hazardous chemicals in consumer products, including food; consumers' right to know about what's in those products; and reform of regulations and the food system to protect consumers from exposure to substances that may harm their health. We write to call your attention to a new peer-reviewed study by scientists from academic institutions, federal and state regulatory agencies and nonprofit research organizations on the continued use by national chain restaurants, including yours, of food wrappers treated with highly fluorinated chemicals known as PFCs or PFASs. The study, published today in *Environmental Science & Technology Letters*, is available at <http://dx.doi.org/10.1021/acs.estlett.6b00435> and is discussed in detail in an accompanying report published today on our website, www.ewg.org.

PFCs (or PFASs) are a family of chemicals originally developed by DuPont and 3M for use in nonstick and waterproof products such as Teflon and Scotchgard, but that were later used in hundreds of applications, including greaseproof coatings for food contact papers and paperboard. The two most widely used chemicals, PFOA and PFOS, were taken off the market more than 10 years ago after internal company studies came to light showing that they were hazardous and built up in people's bodies, and following the discovery that PFOA had contaminated the drinking water of communities around DuPont's plant in Parkersburg, W.Va. In partial settlement of a class-action lawsuit, DuPont funded a seven-year study by independent scientists who found probable links between PFOA exposure and illnesses, including kidney and testicular cancer. Subsequent research has linked PFC exposure to an array of other health effects, including reducing the effectiveness of childhood vaccines.

Since PFOA and PFOS were taken off the market, chemical companies have introduced hundreds of so-called next-generation PFCs, 20 of which are known to be used in coatings for food contact paper. Although their use is legal, it is of concern because these new chemicals have not been adequately tested for safety by neither the manufacturers nor the Food and Drug Administration. Chemical companies say the new compounds are safer because they don't build up in the human body as readily. But their chemical composition is very similar, they do not break down in the environment, and so it is likely they pose some of the same health hazards as the chemicals they replaced. Also, the same property that keeps them from building up in the body may facilitate leaching from the contact paper to food. When your customers eat hot food served in PFC-coated paper, it is likely that they are also consuming the chemicals – in small amounts that nonetheless could have health effects – especially for babies in the womb, exposed through their mothers' diets.

Our report takes pains not to point the finger at fast food companies or their franchisees, or to suggest that eating at one chain is less safe compared to another. Some suppliers of food wrappers claim their papers are PFC-free, but that could mean only that they don't contain the previous generation of chemicals that have been taken off the market. The fact that our tests detected the likely presence of PFCs on fewer than half the papers sampled shows that PFC-free papers are readily available,

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and our report also identifies several domestic and international suppliers of papers not coated with either the old or new generation of these compounds.

With the release of our report, we're asking the FDA to ban or further restrict all PFCs in food contact paper and to close the loophole that lets chemical companies self-certify new compounds as safe even with inadequate safety testing. In the meantime, we are calling on you and other restaurant chains to investigate your supply chains to determine whether your stores and franchises are using papers coated with PFCs, and if so to switch to PFC-free alternatives. Consumers are increasingly seeking food and other products that do not expose them to chemicals that are known or suspected to harm health, and retailers who show concern for their customers' health are tapping into a thriving market that will continue to grow.

Thank you for your attention to this important matter. If you have questions, EWG scientists will be glad to advise you and help you find food contact paper that you can proudly tell your customers is free of this troubling class of chemicals.

Very truly yours,

Handwritten signature of Kenneth Cook in black ink.

Ken Cook, president and co-founder

Handwritten signature of David Andrews in black ink.

David Andrews, senior scientist