Task Group on Food Equipment Materials
51i29r3 - Bisphenols and PFAS
July 21, 2025

Purpose

The purpose of this ballot is to approve new and revised language related to Bisphenols and PFAS in section 4 of Standard 51, and a new definition for PFAS in Standard 170

Background

Issue paper **FE-2024-08** highlighted the need to update language related to the use of materials influencing the presence of Bisphenols and PFAS in food zone materials.

An information paper on Bisphenols was presented to the JCFE by Mike Kohler during its annual meeting on August 9th, 2023. During the same meeting, another information paper on PFAS (PFOS) authored by Joel Hipp and Dipak Negandhi was presented to the JCFE.

In April 2024, US-EPA proposed an extension of the Safe Drinking Water Act restrictions on chemicals to include PFAS and their derivatives effective 2029. Continued inclusion of these chemicals in the human food chain is detrimental to human health.

As an action item Dipak Negandhi volunteered to submit an issue paper and Mike Kohler agreed to help. NSF Staff created an internal report based on a review of various regulations for Bisphenols in the EU, US-FDA and individual states.

In June 2024, language was sent to the FE JC as Revision 1 Approval Ballot, yielding a vote of **22 : 2 : 2 (Affirmative : Negative : Abstain) and 5 comments.**

Since that time, the FEM TG met 4 times with an additional Ad Hoc group meeting to deliberate the comments and revise the language. Details of which can be found in the reference documents.

This Revision 3 straw ballot reflects the language currently accepted by the TG and is presented here for your consideration.

The grey highlighted portions of the language are proposed additions to the language of the standard.
The ~~strikeout~~ portions of the language are proposed deletions to the language of the standard.

An affirmative (yes) vote on this straw ballot means you agree with the revised language as submitted.

A negative (no) vote on this straw ballot means you disagree with the revised language as submitted. A negative vote must include an explanation of why you disagree with the revised draft.

[Note – the recommended changes to the standard which include the current text of the relevant section(s) indicate deletions by use of ~~strikeout~~ and additions by grey highlighting. Rationale Statements are in *red italics* and only used to add clarity; these statements will NOT be in the finished publication.]

NSF/ANSI Standard
for Food Equipment –

Food Equipment Materials

4 Material Formulation

4.1.2 Food zone materials shall not contain ~~lead, arsenic, cadmium, or mercury~~ any of the following as intentional ingredients.

- Lead;
- Arsenic;
- Cadmium;
- Mercury;
- Bisphenols, including BPA, BPAF, BPF, and BPS

Brass and bronze materials may contain lead as permitted under Section 4.2.3.2.

4.1.3 Food zone materials with formulations reviewed and verified to contain no intentionally added Perfluoroalkyl and polyfluoroalkyl substances (PFAS) may be designated as having “no added PFAS in food zone materials”.

Rationale: *Information papers on PFAS and Bisphenols were presented at the 08/2023 JC Meeting. An action to submit an issue paper for restriction of Bisphenols was established. International concerns for health risks associated with Bisphenols has been increasing over the past many years. More recently, concerns on the use of PFAS is growing aggressively but regulations are somewhat inconsistent and in a state of flux. Therefore, this proposal is offering an optional approach for materials without added PFAS to be designated as such. Also, reformatting the structure of this section to a more preferred bullet item list.*

NSF/ANSI 170

3.xxx PFAS: Perfluoroalkyl and polyfluoroalkyl substances. Any chemical with at least a perfluorinated methyl group (-CF3) or a perfluorinated methylene group (-CF2-) without any H/Cl/Br/I atom attached to it (OECD 2021[1] definition). Chemicals considered to be PFAS can be found in the OECD database of PFAS chemicals.

[1] Organization for Economic Cooperation and Development. 2, rue André Pascal, 75016 Paris, France. <https://www.oecd.org>