FEC | Federation of the European Cookware and Cutlery Industries

Swedish proposal for a national ban on PFAS in certain consumer products KN2026/01597

"Choose the EU approach and prioritise safe and sustainable products for consumers"

FEC answer to consultation

November 2026

Executive summary

The Federation of European cookware, cutlery and houseware industry (FEC) and its members would like to share its views on the Swedish proposal for a national ban on PFAS in certain consumer products KN2026/01597.

Consumers expect products that are safe and respectful of their health and the environment. Effective action on PFAS should therefore be based on a rigorous assessment of substances, uses and actual risks.

Sweden is one of the five national authorities that submitted the universal PFAS restriction proposal under REACH. **FEC therefore considers that national action should preserve the integrity and coherence of that EU process rather than pre-empt its final outcome through a separate and accelerated national timetable.** While REACH allows Member States to act in areas that have not yet been harmonised, such measures remain subject to EU single market principles and must independently satisfy requirements of necessity, proportionality, legal certainty and free movement of goods. Sweden itself acknowledges that the proposed ban may affect intra-EU trade, making it particularly important that any accelerated national measure is supported by specific and up-to-date evidence.

In the case of fluoropolymers used in kitchenware, FEC considers that the available evidence does not demonstrate that this specific application presents a level of risk or environmental emissions that would justify an earlier national ban on their use. Fluoropolymers such as PTFE are currently permitted for food-contact applications under the EU food-contact-material framework, and fluoropolymer use in both cookware and domestic appliances for food contact purposes has not, to date, been identified as a major source of PFAS emissions in the ongoing ECHA assessment. **Against this background, FEC considers that fluoropolymers used in these applications should not be subject to a ban. Any regulatory measures should instead be proportionate to the demonstrated risks and emissions associated with the specific use concerned.**

Given that the EU PFAS restriction process is still ongoing and will further determine the appropriate scope, transition periods and derogations, **FEC would encourage Sweden to refrain from introducing an earlier national ban on these products and instead allow the EU restriction process, to which Sweden has itself contributed as a dossier submitter, to reach its conclusion.**

In this context, FEC considers that **proportionate risk-management measures should focus on the relevant emission pathways**, particularly at the end-of-life stage, identified by the Risk Assessment Committee (RAC) of the European Chemicals Agency (ECHA) as the main source of estimated emissions for fluoropolymer-coated cookware and small domestic appliances. Targeted collection, sorting and controlled waste treatment, alongside appropriate upstream emission controls, would offer a more effective and proportionate approach while supporting material recovery and circularity.

Should Sweden nevertheless decide to proceed with a national restriction, despite the absence of clear and product-specific evidence demonstrating that the use of PFAS in kitchenware warrants an accelerated national ban on proportionality grounds, FEC considers that the measure should, at a minimum, provide for an appropriate differentiation for fluoropolymers used in durable food-contact applications.

Such differentiation could be implemented in different ways within the proposed Swedish framework, including by excluding cookware and culinary small domestic appliances directly from the product scope, or by providing a derogation for water-insoluble polymeric PFAS used in functional food-contact surfaces, **as reflected in the amendments proposed in section IV.C of this paper.**

The rationale for these options is that the proposed measure should distinguish between:

- **consumable goods**, designed for single or short-term use and potentially associated with more direct or frequent pathways for environmental releases, and
- **durable consumer products**, designed for repeated use over many years and incorporating specialised materials to ensure safety, performance and longevity.

Cookware and the food-contact parts of small domestic appliances intended for culinary use fall within the latter category. Their functional fluoropolymer surfaces are designed to remain integrated into durable products throughout repeated cycles of use. This specific use profile supports a differentiated regulatory treatment and underpins the two alternative amendments proposed at the end of this paper.

Lastly, we would like to emphasise that such differentiation would be consistent with approaches already taken in other Member States, which demonstrate that national PFAS measures do not necessarily require a general ban on fluoropolymers used in durable kitchenware. In France, cookware has been excluded from the scope of the national PFAS ban, while Denmark has similarly not introduced a general ban covering fluoropolymer uses in kitchenware. Also, in the Netherlands, PTFE remains explicitly permitted for use in non-stick food-contact coatings under the applicable positive-list framework[1]. More about these national situations are found in section IV.B of this paper.

I. Give priority to the ongoing European REACH process

a. Sweden should allow the EU PFAS restriction process to reach its conclusion

The European Union has initiated a comprehensive assessment of PFAS under REACH Regulation (EC) No 1907/2006. ECHA's scientific committees are assessing the substances, uses, alternatives and socioeconomic implications covered by the restriction proposal, including the appropriate scope, derogations and transition periods for specific uses.

Sweden is one of the five authorities that submitted the restriction dossier, alongside Denmark, Germany, the Netherlands and Norway. Its national proposal is therefore being considered while the European scientific and socioeconomic assessment remains underway. While Sweden may have competence to act nationally before this process is concluded, any accelerated national measure must independently satisfy EU law requirements, including proportionality, legal certainty and the free movement of goods.

In these circumstances, national action should preserve the integrity and coherence of the ongoing REACH process and avoid pre-empting its final outcome i.e., including anticipating its conclusions for specific substances and applications before their complete assessment at European level.

The ongoing European restriction process is also considering differentiated approaches, including RO3, a restriction option allowing certain fluoropolymer uses to continue under defined risk-management and emission-control conditions. This confirms that the European assessment does not treat all PFAS uses in the same manner but allows for regulatory options tailored to the characteristics of the substances, their specific uses and the associated emission pathways.

The same principle of differentiation should also be reflected in downstream uses of fluoropolymers in durable products, including cookware and the food-contact parts of small domestic appliances intended for culinary use, where the materials are incorporated into long-life products and are not intended to be released during normal use.

[1] *Dutch Warenwetregeling verpakkingen en gebruiksartikelen, Annex, Part A, Chapter X, Section 11. Official legislation | English translation (RIVM, 2025).*

b. An accelerated national measure would create unnecessary temporary fragmentation

Cookware and small domestic appliances intended for culinary use are manufactured and traded across the European internal market. Introducing Sweden-specific requirements shortly before the completion of the EU REACH process could create temporary regulatory fragmentation and require economic operators to adapt to two successive regulatory frameworks.

A national ban applying earlier than the future EU restriction could lead to Sweden-specific product ranges, additional redesign and supply-chain requirements, increased complexity for cross-border and e-commerce sales, and difficulties for enforcement authorities where the same products remain lawfully available in neighboring Member States.

These considerations do not prevent Sweden from pursuing ambitious environmental objectives, but support doing so within a coordinated European framework wherever possible. This would facilitate consistent implementation and enforcement, preserve the functioning of the internal market and avoid introducing additional national requirements before the scope, derogations and transition periods of the EU PFAS restriction have been finalised.

FEC therefore considers that Sweden should give priority to the ongoing REACH process and refrain from introducing an earlier national ban where the necessity and proportionality of such acceleration have not been clearly demonstrated.

II. The available evidence does not justify an accelerated ban on fluoropolymers in kitchenware

a. Fluoropolymers used in food contact applications have a distinct and controlled safety profile

PFAS comprise a broad and diverse group of substances with significantly different chemical and physical properties. A credible regulatory assessment should therefore consider the characteristics of the substances concerned, their specific uses, exposure pathways and associated risks, rather than assume a uniform risk profile across all PFAS applications.

Fluoropolymers such as PTFE are very-high-molecular-weight macromolecules. In their finished polymerised form, they are stable, insoluble in water and characterised by very low bioavailability and negligible migration potential.

These characteristics distinguish fluoropolymers from smaller, mobile non-polymeric PFAS such as PFPrA, PFPrS, or PFHxS. Their inclusion within the broad PFAS definition should therefore not, in itself, lead to the conclusion that they present the same risk profile or require the same risk-management measures.

The OECD's work on polymer characteristics supports consideration of factors such as molecular weight, oligomer content and water solubility when assessing potential health or environmental concerns[2].These findings illustrate the importance of considering polymer-specific properties in hazard assessment and support a differentiated assessment of fluoropolymers based on their specific characteristics, rather than automatically treating them in the same way as all other PFAS.

The German Federal Institute for Risk Assessment (BfR) concludes[3] that adverse health effects are not expected when PTFE-coated cookware is used as intended. The BfR distinguishes such normal use from overheating, in particular strongly heating empty cookware to temperatures around 360°C or above, which should be avoided.

For cookware and the food-contact parts of small domestic appliances intended for culinary use, the available evidence therefore supports a differentiated assessment of fluoropolymer applications within the existing EU regulatory framework for chemicals, food-contact materials and consumer-product

[2] *OECD (2009), Data Analysis of the Identification of Correlations between Polymer Characteristics and Potential for Health or Ecotoxicological Concern, ENV/JM/MONO(2009)1.* OECD publication

[3] *German Federal Institute for Risk Assessment (BfR), "No adverse health effects to be expected from cookware with PTFE non-stick coating", FAQ, 2 July 2025.* BfR publication

safety. This should be taken into account when assessing whether an additional and accelerated national restriction is necessary and proportionate.

An exemption from the Swedish national ban would not excuse these products from existing EU requirements, as all applicable chemical, food-contact-material and product-safety obligations would continue to apply, of course.

b. Kitchenware is a durable, non-dispersive application

Cookware and small domestic appliances intended for culinary use are durable consumer products, designed for repeated use over many years. Their fluoropolymer coatings form an integral part of functional food-contact surfaces and are engineered to withstand repeated cooking cycles, heat exposure, cleaning and mechanical stress throughout the product's lifetime.

This application profile differs materially from that of short-lived or consumable products, where substances may be more directly or frequently released during use or disposal. In cookware and culinary small domestic appliances, fluoropolymers are incorporated into the product and are not intended to be released during normal conditions of use.

This distinction between consumable and durable applications is therefore relevant when assessing the necessity and proportionality of regulatory measures. A use-specific approach should take into account not only the presence of PFAS, but also the product lifetime, the way the material is incorporated into the product and the actual pathways through which releases may occur.

c. Substitution must be technically and environmentally credible

Alternative coatings may be suitable for some products and uses. However, the availability of an alternative technology does not necessarily mean that it provides an equivalent combination of durability, safety, industrial scalability and consumer performance across all applications.

A proportionate substitution assessment should therefore consider the technological maturity of alternatives, their performance over the full product lifetime, their environmental impacts, and their ability to meet applicable safety and functional requirements. It should also take into account the industrial adaptations and investment required to implement substitution at scale.

There is currently no single alternative capable of providing the same combination of properties across all cookware and small domestic appliances applications. Regulatory measures should therefore allow sufficient time and flexibility for innovation and substitution where technically and environmentally appropriate, while avoiding the premature phase-out of fluoropolymer uses for which no equivalent solution is yet available.

Accelerated substitution without a sufficiently robust assessment of alternatives could result in significant industrial adaptation costs, reduced product performance or durability, and unintended environmental or economic trade-offs. These considerations should form part of the proportionality assessment before imposing an earlier national restriction.

III. Prioritise targeted emission controls and end-of-life management for durable fluoropolymer-containing food contact products

Based on ECHA's RAC estimates, fluoropolymer-based non-stick applications account for only 0.045% of total estimated non-polymeric PFAS emissions across the 14 sectors assessed, with the vast majority of estimated emissions from cookware and small domestic appliances occurring at the end-of-life stage.

These findings support considering risk-management measures that specifically address the relevant emission pathways, rather than relying exclusively on restrictions on the placing on the market of durable products.

Further, recent scientific studies and reviews[4] show that properly controlled incineration can achieve very high PFAS destruction rates and low levels of measured fluorinated by-products, supporting its potential role in reducing end-of-life emissions from fluoropolymer-containing waste:

- The *KIT study* (Gehrmann et al., 2024), a pilot-scale study involving several fluoropolymers, including PTFE, reported a reduction rate of over 99.99% for measured fluorinated substances resulting from incomplete combustion, under conditions representative of European municipal and hazardous-waste incineration.
- More recently, a full-scale municipal waste incineration test involving added PFAS demonstrated the potential of controlled thermal treatment to achieve very high destruction rates (Schweinfurt test, 2026). The study reported a calculated fluorine-based destruction rate exceeding 99.9999%, remaining as high as 99.7% even when accounting for CF4, a greenhouse gas formed during incomplete combustion. These findings provide further evidence that properly controlled incineration can be an effective option for managing PFAS-containing waste at end-of-life, provided that potential emissions and by-products are appropriately monitored and controlled.
- Lastly, a scientific review bringing together recent evidence of high PFAS destruction performance under controlled incineration conditions was also published by Dr. Barbara Henry, a toxicologist and an internationally recognised expert in the risk and hazard assessment of PFAS and fluoropolymers (SPECTARIS 2026). The review further suggests that RAC's assumed release factors of 1% for hazardous-waste incineration and 2% for municipal waste incineration may significantly overestimate actual PFAS emissions from modern, properly operated incineration facilities.

Taken together, these scientific findings support controlled thermal treatment as a potential solution to reduce PFAS emissions at end-of-life. FEC therefore calls on relevant regulatory authorities, including the European Commission and the Swedish authorities, to consider this evidence and reassess current end-of-life emission assumptions, where justified by representative experimental data.

More broadly, FEC supports a targeted and proportionate approach to managing emissions throughout the fluoropolymer lifecycle, focusing on the stages where relevant emission pathways have been scientifically demonstrated:

- **Upstream**, emissions from fluoropolymer manufacturing should continue to be addressed through stringent, enforceable and technically appropriate emission-control requirements, building on existing EU environmental legislation, best available techniques (BAT), and the risk-management approach reflected in RO3b[5].
- **Downstream**, once cookware and small domestic appliances reach the end of their useful life and become waste, complementary measures could focus on selective collection, appropriate identification and sorting, and controlled treatment of fluoropolymer-containing components. Such measures should aim to ensure effective destruction or containment of PFAS emissions during waste treatment, while enabling the recovery of aluminium and other valuable materials wherever technically feasible.

We believe these measures should complement, rather than replace, a differentiated regulatory approach that considers the specific properties, applications and risks of fluoropolymers.

Importantly, addressing emissions at manufacturing and end-of-life does not imply that the use of fluoropolymers in durable food-contact products itself presents an unacceptable risk.

Against this background, FEC considers that an accelerated national ban on fluoropolymer-coated cookware and small domestic appliances would be disproportionate, particularly while the ongoing EU REACH restriction process is assessing the appropriate regulatory framework for these applications. **Targeted lifecycle emission controls should instead be considered as part of a proportionate, evidence-based regulatory approach** that protects the environment while allowing the continued use of these durable applications under appropriate conditions.

---

[4] Gehrmann et al., Chemosphere 365 (2024), DOI: 10.1016/j.chemosphere.2024.143403; Schweinfurt full-scale incineration test (2026); Barbara Henry, Scientific Report on Fluoropolymers End-of-Life, SPECTARIS (2026).

[5] European Chemicals Agency (ECHA), Updated PFAS Restriction Proposal - Background Document (August 2025), Annex E, Section E.2.1, "PFAS Manufacturing", Restriction Option 3b (RO3b).

IV. Should Sweden nevertheless proceed, the measure should differentiate the durable use of fluoropolymers for food contact purposes

a. Distinguish consumable goods from durable consumer products

Should Sweden nevertheless proceed with an earlier national restriction, FEC considers that the measure should distinguish more clearly between short-lived or potentially dispersive consumer goods and durable products in which fluoropolymers remain integrated throughout repeated use.

A relevant distinction could therefore be made between:

- **Consumable goods**, designed for single or short-term use and potentially associated with more direct or frequent pathways for releases during use or disposal; and
- **Durable consumer products**, designed for long-term and repeated use and incorporating specialised materials, including fluoropolymers, to ensure safety, resistance, performance and longevity.

Cookware and small domestic appliances intended for culinary use fall within the latter category. Their fluoropolymer coatings are incorporated into functional surfaces designed to remain part of the product through repeated cooking cycles, heat exposure, cleaning and long-term use.

Taking this use profile into account would allow the Swedish measure to focus more proportionately on applications associated with greater potential for dispersive releases, while providing appropriate differentiated treatment for durable fluoropolymer applications.

Such differentiation would support a more proportionate and use-specific approach, while remaining consistent with product safety, durability and circular economy objectives.

b. Existing national approaches demonstrate that such differentiation is feasible

The national initiatives referred to in the Swedish memorandum support a targeted approach:

- **France:** the national law covers selected categories, including cosmetics, ski wax, certain textiles, footwear and waterproofing products. Cookware and small domestic appliances intended for culinary use are not banned. Legal source here.
- **Denmark:** national measures target defined categories such as clothing, footwear, waterproofing products and certain food-contact paper and cardboard. Cookware and small domestic appliances intended for culinary use are not banned. Legal source here.
- **The Netherlands:** PTFE is specifically authorised for use in non-stick coatings through the Dutch positive-list framework. Dutch measures concerning food-contact materials instead target particular applications, notably certain PFAS in paper and cardboard. Legal source here.
- **Germany:** the German Government rejects a blanket ban on PFAS and supports a risk-based, differentiated regulatory approach, particularly for fluoropolymers. Its *2025 coalition agreement* further calls for PFAS substitution where equivalent alternatives are available, while the German chemical agenda explicitly supports appropriate transition periods and derogations, allowing for the continued use of PFAS, potentially without time limits, where suitable alternatives or technologies are not available. Sources here (coalition agreement) and here (agenda).
- **Belgium:** no national ban covering cookware or small domestic appliances intended for culinary use has been enacted. The Belgian Federal Government, the Federal Public Service Economy, the Federal Public Service Health, the Flemish Government and the Federal Agency for the Safety of the Food Chain support a coordinated European approach, notably to avoid regulatory divergence and difficulties in controlling imported products. A law proposal at the Federal Chamber of Representatives on PFAS ban in consumer goods was even rejected back in June 2026.

Therefore, including cookware and small domestic appliances intended for culinary use in the Swedish ban measure would result in a broader product scope than the existing national measures referred to above.

As such, keeping these durable consumer products outside the Swedish national ban would be consistent with the targeted approaches followed by other Member States and would allow the European REACH assessment to proceed under a common scientific and regulatory framework.

c. Proposed amendments to the Swedish proposal

Taking into account the arguments developed throughout this paper, and with reference to the document published by the Swedish authorities in July 2026 *Promemoria Nationellt förbud mot PFAS I visa konsumentprodukter*, FEC puts forward the following amendment proposals for consideration by the competent authorities.

Option 1 | Exclude food-contact kitchenware from the proposed national PFAS restriction under Sections 11b and 11c, and remove the corresponding supervision provision under Chapter 2, Section 22 of the Environmental Supervision Ordinance (2011:13)

Original proposal	FEC amendment proposal
PFAS i vissa konsumentprodukter	*PFAS i vissa konsumentprodukter*
(...)	*(...)*
11 b §	*11 b §*
Följande produkter får inte tillhandahållas på marknaden till konsumenter om de innehåller PFAS i en koncentration som är lika med eller över de gränsvärden som anges i 11 c §:	*Följande produkter får inte tillhandahållas på marknaden till konsumenter om de innehåller PFAS i en koncentration som är lika med eller över de gränsvärden som anges i 11 c §:*
1. kläder och skor,	*1. kläder och skor,*
2. impregneringsmedel för kläder och skor,	*2. impregneringsmedel för kläder och skor,*
3. kosmetiska produkter,	*3. kosmetiska produkter,* ***och***
4. köksredskap som är avsedda att komma i kontakt med livsmedel, och	***~~4. köksredskap som är avsedda att komma i kontakt med livsmedel, och~~***
5. skidvalla.	*5. skidvalla.*
11 c §	*11 c §*
(...)	*(...)*
Gränsvärdena ska i fråga om köksredskap tillämpas på den eller de delar av produkten som är avsedda att komma i kontakt med livsmedel.	***~~Gränsvärdena ska i fråga om köksredskap tillämpas på den eller de delar av produkten som är avsedda att komma i kontakt med livsmedel.~~***
(...)	*(...)*
2 kap. 22 §	***~~2 kap. 22 §~~***
Första stycket gäller inte tillsyn över förbudet mot PFAS i köksredskap enligt 11 a–11 f §§ förordningen (1998:944) om förbud m.m. i vissa fall i samband med hantering, införsel och utförsel av kemiska produkter.	***~~Första stycket gäller inte tillsyn över förbudet mot PFAS i köksredskap enligt 11 a–11 f §§ förordningen (1998:944) om förbud m.m. i vissa fall i samband med hantering, införsel och utförsel av kemiska produkter.~~***

Option 2| Derogation for fluoropolymers used in functional surfaces of durable food-contact kitchenware under Section 11f (proposed new point 5)

Original proposal	FEC amendment proposal
PFAS i vissa konsumentprodukter	*PFAS i vissa konsumentprodukter*
(...)	*(...)*
11 f §	*11 f §*
Förbudet i 11 b § gäller inte	*Förbudet i 11 b § gäller inte*
1. kläder som innehåller minst 20 procent återvunnet material som kommer från avfall från slut-användare,	*1. kläder som innehåller minst 20 procent återvunnet material som kommer från avfall från slut-användare,*
2. personlig skyddsutrustning avsedd att skydda användare mot risker som omfattas av bilaga I till Europaparlamentets och rådets förordning (EU) 2016/425 av den 9 mars 2016 om personlig skydds-utrustning och om upphävande av rådets direktiv 89/686/EEG,	*2. personlig skyddsutrustning avsedd att skydda användare mot risker som omfattas av bilaga I till Europaparlamentets och rådets förordning (EU) 2016/425 av den 9 mars 2016 om personlig skydds-utrustning och om upphävande av rådets direktiv 89/686/EEG,*
3. impregneringsmedel för återimpregnering av sådan personlig skyddsutrustning som avses i 2, och	*3. impregneringsmedel för återimpregnering av sådan personlig skyddsutrustning som avses i 2, **~~och~~***
4. produkter som har varit i bruk och som är lämpliga för fortsatt användning i befintligt skick eller efter reparation.	*4. produkter som har varit i bruk och som är lämpliga för fortsatt användning i befintligt skick eller efter reparation**, och***
	5. köksredskap som är avsedda att komma i direkt kontakt med livsmedel och vars funktionella ytor är beroende av användning av fluorpolymerer.