EWG SMART PICKS

PFAS-free cookware

SUBMISSION CRITERIA FOR BRANDS

A single recognition standard – EWG has reviewed the evidence

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What is EWG Smart Picks?

EWG Smart Picks is a single-standard product recognition program. A cookware line earns the Smart Picks designation when a brand submits test evidence that EWG confirms meets the criteria below.

There is no application fee. The review process relies on the documentation you provide at intake – EWG confirms your submission meets our criteria. We do not commission independent tests.

Product scope

This standard applies to bakeware and cookware sets that are uncoated cookware such as (stainless steel, cast iron, carbon steel); coated cookware such as (ceramic, nonstick); fired ceramic articles; or enameled cast iron. Details about the standard include:

- **Unit of recognition:** the product-line level – a named product line sharing a common coating or material formulation. One set of test results covers all colors and sizes within that line, as long as they share the tested formulation.
- **Not eligible:** nonstick coatings containing fluoropolymer including PTFE, PFA, FEP or ETFE.
- Total organic fluorine testing and heavy metal leaching tests are the focus of this standard.

Qualification rule

To earn EWG Smart Picks, a cookware line must be free of intentionally added PFAS and must pass the specified heavy metal leaching panel.

- **All product lines must maintain a public PFAS-free declaration** and a CA AB 1200 chemical disclosure page showing no intentionally added PFAS.
- **All coated product lines must show a total organic fluorine result below 50 ppm** on the food-contact surface, and all products must provide written confirmation that the manufacturing line does not also produce PFAS-containing products.

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Uncoated metals such as stainless steel, carbon steel and cast iron are exempt from the total organic fluorine requirement.

- **All product lines must pass a heavy metal migration panel.**
- **Total lead content must be verified as ≤ 90 ppm**.

Test evidence is required for every product line claimed. Results from one line may not be used to support another line built on a different coating or material formulation.

PFAS tests required

Criteria	Requirement
Public PFAS-free declaration	• A brand's website must state the product line is free of intentionally added PFAS and maintain a public chemical disclosure page per CA AB 1200 (no intentionally added PFAS disclosed).
Total organic fluorine, or TOF, and PFAS test results (not required for uncoated metals such as stainless steel, carbon steel, cast iron)	• TOF tests conducted on the food-contact surface of at least one representative SKU per product line. Result must be below 50 ppm. • Combustion ion chromatography is the reference method; EPA 1633 or an equivalent targeted analysis is acceptable as a confirmatory follow-up. • The test report must state the method and detection limit. A detection limit of ≤ 20 ppm is required so the 50 ppm threshold is analytically meaningful.
Supply chain and cross-contamination	• Written confirmation that the manufacturing line does not also produce PFAS-containing products.

Heavy metals migration panel required and lead content verification

The six-metal panel

Food-contact migration tests must be conducted for all product types per Council of Europe Resolution CM/Res(2020)9 and the EDQM Technical Guide Metals and alloys used in food contact materials and articles, 2nd ed. (2024), under the conditions assigned in the current Joint Research Centre (JRC) of the European Commission kitchenware testing guideline, 5th ed. (2025). The migration limits that apply for Smart Picks are those in the table below, and where they are more protective than the limits in the

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cited documents, the table governs. The reporting limit for each element must be no higher than the applicable migration limit in the table below. For elements not listed in the table, the specific release limits in the current edition of the EDQM Technical Guide apply. For repeated-use articles compliance is determined on the third successive migration (and per the testing guidance the sum of the first and second migrations must be less than seven times the SRL) and each tested item must pass.

Sol-gel derived coatings (including most ceramic nonstick coatings) are not assigned conditions in the current JRC guideline. As recommended, these should be tested under JRC Annex 3 (inorganic materials and coatings) conditions — 100 °C or reflux for 2 h — not the Directive 84/500/EEC ceramic protocol.

According to Annex 3, glazed and fired ceramic items undergo testing following Directive 84/500/EEC parameters — 4% (v/v) acetic acid solution in water, maintained at 22 ± 2 °C over a 24 ± 0.5 h duration — instead of the 100 °C/2 h protocol used for metallic alloys, enameled surfaces, and other inorganic substances. Every metal in the specified six-element panel must be analyzed from a single leachate sample and conform to its respective threshold; standard lead or cadmium boundaries outlined in the Directive are superseded by Smart Picks criteria. Given that this framework mandates only one migration cycle, requirements for successive third-run testing alongside the sevenfold SRL limit are non-applicable to ceramics evaluated through this procedure. Results must be reported in mg/kg food, recalculated using the real surface-to-volume ratio per the JRC guideline's conventions.

Metal	Migration limit
Lead (Pb)	≤ 0.010 mg/kg food
Cadmium (Cd)	≤ 0.005 mg/kg food
Arsenic (As)	≤ 0.002 mg/kg food
Aluminum (Al)	≤ 5.0 mg/kg food
Nickel (Ni)	≤ 0.14 mg/kg food
Chromium (Cr as Cr(III))	≤ 1.0 mg/kg food

Lead content verification

Total lead content applies to all product types with substrate and coating combined: ≤ 90 ppm. Testing methodology should follow CPSC-CH-E1001-08.3/E1002-08.3 using ICP-OES, ICP-MS, FLAA, GFAA or XRF with XRF requirement that the result plus stated uncertainty fall at least 30% below 90 ppm to be conclusive, applied uniformly regardless of whether the tested layer would otherwise be classified as substrate or coating under CPSIA.

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What to submit

- [ ] Link to the brand's public AB 1200 disclosure page and PFAS-free-claim URL.
- [ ] TOF test report(s) – one per product line – showing a result below 50 ppm, the test method used and the detection limit.
- [ ] One migration test report per product line, covering the complete element report as generated by the method, not limited to the six metals above.
- [ ] Total lead content test report.
- [ ] A list of the product line(s) and the SKUs each covers.

EWG review process

Step	Action required	Notes about next steps
Apply	Submit the online checklist form and upload test reports.	Intake is automated. Submissions missing required fields (TOF value or the six-metal panel) will be rejected and returned for completion.
Review	Respond to EWG requests for additional information, if any, within 10 business days.	EWG checks the TOF result against the 50 ppm threshold and the six metal results against the panel limits.
List	Provide line or model information and product photography.	EWG creates the Smart Picks listing.
Renew	Annually confirm coating formulation, substrate and suppliers have not changed. Updated test data is required, if they have changed.	EWG sends an automated reminder 60 days before renewal is due, then confirms your attestation or reviews new data.

Staying current: Annual review

- Annual attestation is required confirming that coating formulation, substrate and suppliers have not changed. Updated test

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data are required, if they have changed.

- New TOF and metals tests are required any time the formulation, substrate or manufacturing facility changes.
- EWG may ask a brand to respond to credible, independent third-party findings about a listed product. Brands have 30 days to respond with data; the listing is publicly flagged "Under review" in the interim.

A note on terminology

"Migration," or "leaching" tests measure what transfers from cookware into food under simulated cooking conditions. This is different from total-content tests, such as XRF screening, which measures how much of a metal is present in the material itself but not necessarily how much reaches food. Smart Picks requires migration tests for all cookware products.

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