

Submission by the Endocrine Society to the European Commission public consultation on restrictions on bisphenol A (BPA) and other bisphenols in food contact materials. Developed by the Society European Union EDC Task Force

March 7, 2024

The Endocrine Society welcomes the opportunity to comment on the proposed regulation on the use of bisphenol A (BPA) and other bisphenols and their derivatives. Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization devoted to research on hormones and the clinical practice of endocrinology. Our membership consists of over 18,000 scientists, physicians, educators, nurses, and students in more than 100 countries. Society members represent all basic, applied, and clinical interests in endocrinology. Included among our members are the world's leading experts on the health effects of endocrine-disrupting chemicals (EDCs) including BPA and other bisphenols.

Our Society supported the updated opinion issued by the European Food Safety Authority which established a revised tolerable daily intake level for BPA in food contact materials of 0.2 nanograms per kilogram of body weight per day. In light of this opinion, and consistent with decades of scientific research suggesting that BPA may have adverse effects at extremely low levels that are relevant in the context of hormone signaling and biology, we believe that the proposed ban on BPA is consistent with scientific evidence and the Commission's public health objectives. We are also encouraged by the provision to conduct evaluations and risk assessments for other bisphenols and derivatives of BPA, with the expectation that further restrictions to this group of chemicals will be necessary to reduce public health harms from exposure to bisphenols.

In our view, the proposal could be further improved through measures to better protect against regrettable substitutions, consistent with the precautionary principle. Given the abundance of bisphenols for which there is limited data, we encourage the Commission to include the CMR hazard category 2, i.e., suspected hazards, under the proposed restrictions. We also note that recycling and circular approaches do not address exposure to hazardous chemicals in plastic and other recycled materials. Indeed, some approaches may further concentrate bisphenols and other hazardous EDCs. We therefore caution against exempting recycled materials from the proposed regulation.

Our members also took note of the risk assessment approach proposed for other bisphenols, and encourage the commission to ensure that assessments are capable of properly evaluating risks from EDCs. In order to accomplish this, assessments should be able to:

- Account for low-dose effects and non-monotonic dose responses (NMDR)
- Incorporate peer-reviewed scientific publications from academic researchers



- Use read-across to apply knowledge and results from known hazardous chemicals to data-poor chemicals when necessary to improve the regulatory approach for all bisphenols.

In conclusion, we commend the Commission for taking this important step to reduce exposure to hazardous EDCs and look forward to expeditious implementation of the regulation. Thank you for considering our comments.